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August 2, 2007
Confidential Settlement Communication

Mr. Thomas Martin
U.S. EPA, Region V
Office of Regional Counsel
77 West Jackson Blvd. (C-14J)
Chicago, IL 60604-3590

Mr. Timothy Fischer
U.S. EPA Region V
77 West Jackson Blvd. SR-6J
Chicago, IL 60604-3507

Re: Clayton Chemical Site and Sauget Area 2 Sites

Dear Mr. Martin and Mr. Fisher:

In the past six months, Pharmacia Corp. ("Pharmacia") and Solutia Inc. ("Solutia") have attempted to settle with the Clayton Chemical Parties ("CC Parties") regarding costs that Pharmacia and Solutia have incurred in remediating groundwater in Sauget, Illinois under a Unilateral Administrative Order issued on September 30, 2002 ("UAO"). The settlement negotiations included a demand letter for the costs incurred to install the interim groundwater remedy. The offer extended by our clients to satisfy the demand was for the CC Parties to join the Sauget Area 2 Sites Group ("SA2SG") allocation process for a minimal payment.

You have requested that we make another attempt to settle our clients' claims against the CC Parties.[1] Thus, we will be sending letters to the CC Parties in the near future that will set forth a new offer as described below. We note that to date, Pharmacia and Solutia have incurred over $34.7 million in implementing the interim groundwater remedy under the UAO.

[1] The offer will be sent to the CC Parties despite the fact that no counter offer was received from any of the CC Parties in response to our clients' offer. Rather than send to us a counter offer and negotiate directly with us, the CC Parties have instead attempted to obtain a de minimis settlement with contribution protection from EPA against the direct costs our clients have incurred, which protections are not available under CERCLA. The United States Supreme Court in *United States v. Atlantic Research*, Case No. 06-562 (June 11, 2007), clarified that our clients' claims are based on §9607 and are not claims for contribution. Therefore, any de minimis settlement the CC Parties might enter with the government under §9622 will not bar a §9607 claim for response costs directly incurred by our clients.

The Basis for Pharmacia and Solutia's Claims

The recent decision by the United States Supreme Court in *Atlantic Research* makes it clear that Pharmacia and Solutia have a claim under 42 U.S.C. §9607 against responsible parties for recovery of response costs incurred in the remediation of groundwater in Sauget. In order to assert a claim under §9607 against Clayton Chemical and its customers, we only need to prove that Clayton Chemical is a facility, that a release or threatened release has occurred, that the release has caused our clients to incur response costs, and that each CC Party is a 'responsible party.' See *Kerr-McGee Chemical Corp v. Lefton Iron and Metal*, 14 F.3d 321, 325 (7th Cir. 1993). Each CC Party is a 'responsible party' because each party arranged for the disposal of a hazardous substance at the Clayton Chemical Site ("Clayton Site"). See *United States v. A&F Materials Co., Inc* 582 F. Supp. 842 (S.D. Ill. 1984). See also, *U.S. v. Davis*, 261 F.3d 1, 42-44 (1 Cir. 2001); *Unites States v. Chrysler Corp.* et al, 157 F. Supp.2d 849, 861 (N.D. Ohio, 2001).[2] There is no need for our clients to show that any one CC Party's specific waste was released to prove liability, but only that waste of the same type as that CC Party's was found at the Clayton Site where hazardous substances were released. *Town of Munster, Ind. V. Sherwin-Williams Co., Inc.* 27 F. 3d 1268, 1274 (7th Cir., 1994). Note that a plaintiff in a CERCLA response action involving multiple responsible parties need not prove a specific causal link between costs incurred and an individual responsible person's waste. *See, Kalamazoo River Study Group v. Menasha Corp.* 228 F.3d 648, 655 (6th Cir. 2000). Once we prove liability under §9607, it becomes a CC Party's burden to prove that its waste did not contribute to cleanup costs. *Davis*, at p. 44.

Clayton Chemical released its customers' waste onto the Clayton Site via spills and leaks. The Clayton Site soil and groundwater contain large amounts of hazardous substances from these releases. See the Clayton Chemical 2001 Site Assessment Report and the groundwater results from the SA2SG sample Clay-2. (Please let us know if you need copies of these. Both were referenced in the letter we sent to you on December 9, 2005 regarding the groundwater at the Clayton Site.) Based on work done by the SA2SG, it is clear that hazardous substances disposed of and released at the Clayton Site have migrated via the groundwater to the Sauget Area 2 Sites.

[2] Because hazardous substances have come to be located on both the Clayton Site as well as the Sauget Area 2 Sites, and there was clearly a release from the Clayton Site, it is irrelevant whether the Sauget Area 2 Sites are also a facility because the hazardous substances from the Clayton Site eventually came to rest on the Sauget Area 2 Sites. *See, Nutrasweet Co. v. X-L Engineering Co.*, 227 F. 3d 776, note 12 at 792 (7th Cir. 2000).

(The recently submitted Isoconcentration Maps and Groundwater Model support this position).

In addition, contaminated groundwater from the Clayton Site is migrating down gradient into the Sauget Area 2 Sites at levels above Illinois Class I groundwater standards for a number of hazardous substances. (See Attachment 1). We fully expect the state and/or the United States to object to such off site migration of contaminated groundwater. Much to the good fortune of the CC Parties, the Clayton Site groundwater is migrating directly into the Area 2 groundwater and is being captured by the interim groundwater remedy. This being the case, the CC Parties will not have to address contaminated groundwater at the Clayton Site because a remedy performed by our clients is already in place.

Merely because there are CERCLA sites located down gradient of the Clayton Site that are also releasing hazardous substances into the groundwater and which are migrating to the interim groundwater remedy, does not relieve the CC Parties from paying for the costs of the remedy from which it is benefiting. Based on the reasoning in *Browning-Ferris Indus. Of Ill. V. Richard Ter Maat*, 195 F.3d 953, 958 (7th Cir. 1999) and *Akzo Nobel Coatings v. Aigner Corp.* 197 F.3d 302, 305-6 (7th Cir. 1999), the CC Parties are liable for a share of the costs that they would otherwise have to pay to address the Clayton Chemical groundwater contamination, but for the interim groundwater remedy paid for and installed by Pharmacia and Solutia.

We are in receipt of a letter sent to EPA by Penni Livingston regarding the General Notice Letter EPA sent to her client, MarChem. Ms. Livingston completely mischaracterizes the course that the litigation took in the suit filed by our clients against MarChem (and a number of others). In fact, MarChem received the benefit of the U.S. Supreme Court's decision in *Cooper v. Aviall,* which was issued just before our case was set to go to trial and several years before the clarifying decision in *Atlantic Research.* As you are aware, Judge Reagan found in our case that the Sauget Area 2 AOC is not a settlement or a "civil action" under CERCLA and thus found that we had no claim for recovery of costs that our clients incurred under the AOC under §9613 (the contribution section of CERCLA). Also Judge Reagan found that the UAO was not a settlement or "civil action," thus barring our §9613 contribution claims. Rather than proceed with a direct action under 42 USC §9607 after Judge Reagan's rulings, we instead settled with MarChem (and others).[3] Thus, the settlement was not entered because of what the facts would have shown

[3] Because of the determinations by Judge Reagan, our clients have only one means of cost recovery under CERCLA for work they have performed in Sauget Area 2, that is via §9607. The United States has no authority to give protection under §9622 against direct claims such as these. *See, Atlantic Research,* slip opinion, pg. 11. If EPA settles with the CC Parties (or any other parties in Sauget) in a de minimis settlement, our client will have no choice

regarding groundwater migration, contaminant fate and transport, etc, but rather because of the position our client was put in after the *Cooper v. Aviall* decision.[4]

The Clayton Site groundwater is highly contaminated from the Shallow Hydrogeologic Unit to the Deep Hydrogeologic Unit with constituents that are the result of years of releases by the Clayton Chemical solvent recycling operations. The interim groundwater remedy at the river prevents those contaminants from causing any impact on the river.

The Offer to be Sent to the CC Parties

We will be sending to the CC Parties a summary of the potential groundwater remedies that they likely would be required to implement if the interim groundwater remedy had not already been installed and capturing the Clayton Chemical groundwater. We have experts in remediation working on this summary in order to reflect what we believe the State of Illinois or EPA would require. We expect the types of groundwater remedies that would have to be considered in an alternatives analysis under the NCP at the Clayton Site will range from one that merely would require monitoring of groundwater to a remedy that would require a barrier wall and groundwater pumping (similar to what has been installed at the rivers edge by our clients).

In order to settle this matter, we will offer the CC Parties a settlement number that will assess a portion of the costs our clients have incurred that are attributable to the groundwater contamination originating from the Clayton Site. This settlement will primarily be based on the cost of installing and operating a reasonable groundwater remedy at the Clayton Site.

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but to file a §9607 cost recovery suit against the CC Parties. Such a suit is assured of success because of Judge Reagan's rulings in our prior Sauget case. Any such law suit will not only be expensive for the litigants, but will also result in adverse rulings for the United States on its settlement authority.

[4] In fact, we were confident that we would have proven that the Clayton Site groundwater is migrating into the Sauget Area 2 Sites and being captured by the groundwater remedy. We would have shown the opinions of Mr. Bogner (a geologist who has no degree in hydrogeology) to be incorrect and of little value. The extensive sampling and modeling that the Area 2 Group has done since the litigation came to a close have proven Mr. Bogner's opinions regarding the characteristics of the Clayton Site groundwater to be incorrect. In addition, there was no "distinct evidence that Site R had contaminated the RRG site" as Ms. Livingston "remembered." Rather, the evidence shows that in the years prior to the implementation of the groundwater remedy, Site R groundwater, even at the highest river stages, did not migrate back to the Clayton Site.

Husch & Eppenberger, LLC

In order to avoid litigation and negative rulings, as noted in Footnote 3 above, we ask that EPA include us in any settlement discussions with the CC Parties regarding the groundwater remedy. Once we send our letters to the CC Parties, we will be prepared to meet with you and the CC Parties at any time that is convenient to you.

Husch & Eppenberger, LLC

By: Linda W. Tape
Linda W. Tape

cc: Mr. Skipp Kropp, Counsel for Solutia Inc.

Attachment 1

1. Exhibit 1 to this Attachment contains isoconcentration maps that have been submitted to EPA. The maps include:

   Benzene
   Chlorobenzene
   1,4 – dichlorobenzene
   1,2 - dichloroethene
   Trichloroethene
   Vinyl chloride

   These maps show that each constituent is found at Clayton as well as down gradient in the Sauget Area 2 Sites Groundwater.

2. The SA2SG sampled two wells on the Clayton Site in the last two years. One was located in the middle of the Clayton process area (Clay-2) and one is located on the property boarder on the west side of the Site (MW-4). See the site sampling map in Exhibit 2. The constituents in the wells that were found above Illinois Class I Groundwater standards (which are the standards that IEPA has asserted apply in Sauget) are attached in Exhibit 3. Clearly, a number of constituents are migrating off the site at levels above the Class I groundwater standards.

3. Finally, constituents found in groundwater being pumped from the groundwater management system installed by our clients down gradient of the Clayton Site include many of the constituents found in the wells at the Clayton Site. See Exhibit 4 which includes the latest analysis of water pumped from the groundwater management system.

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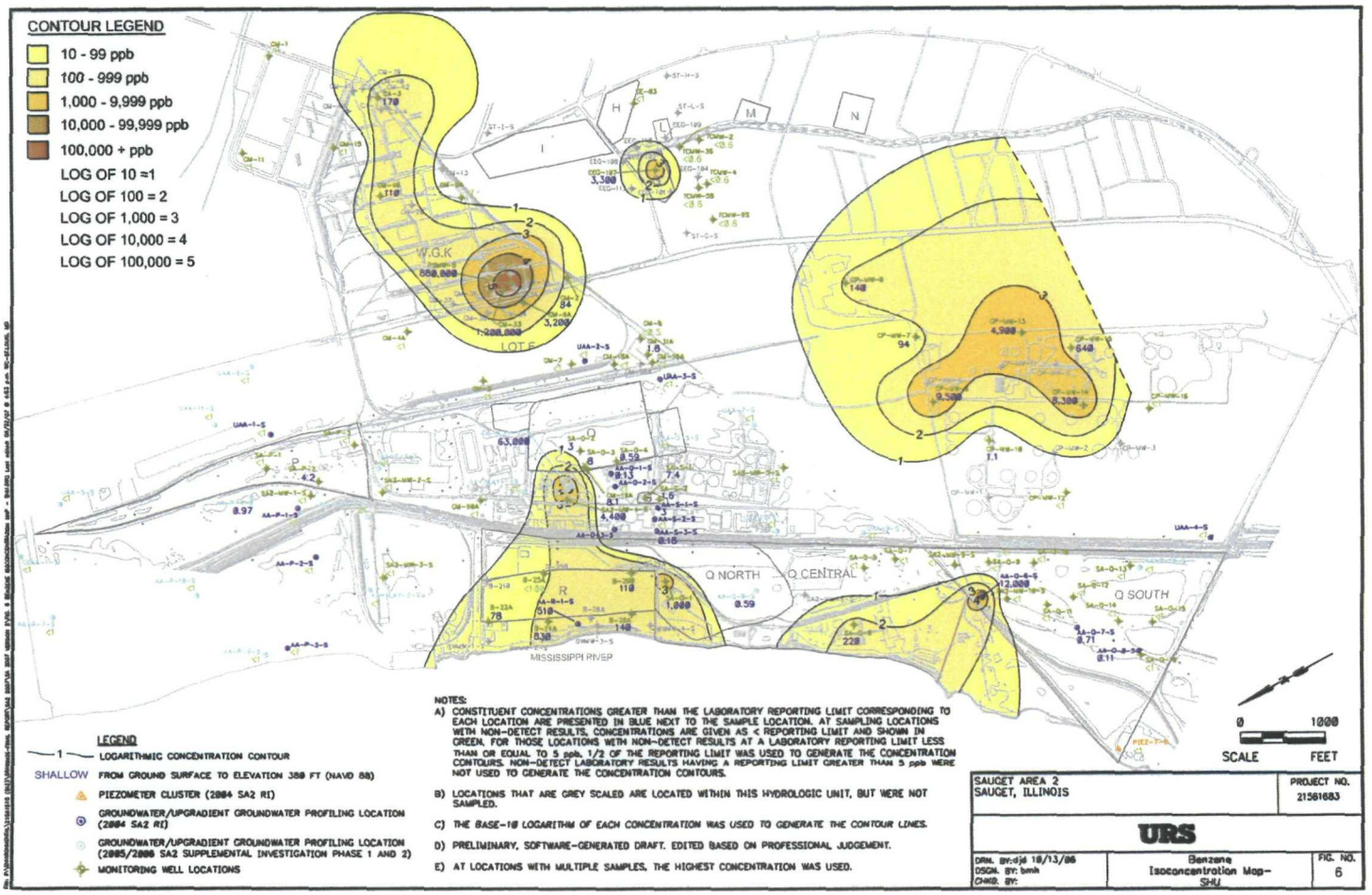

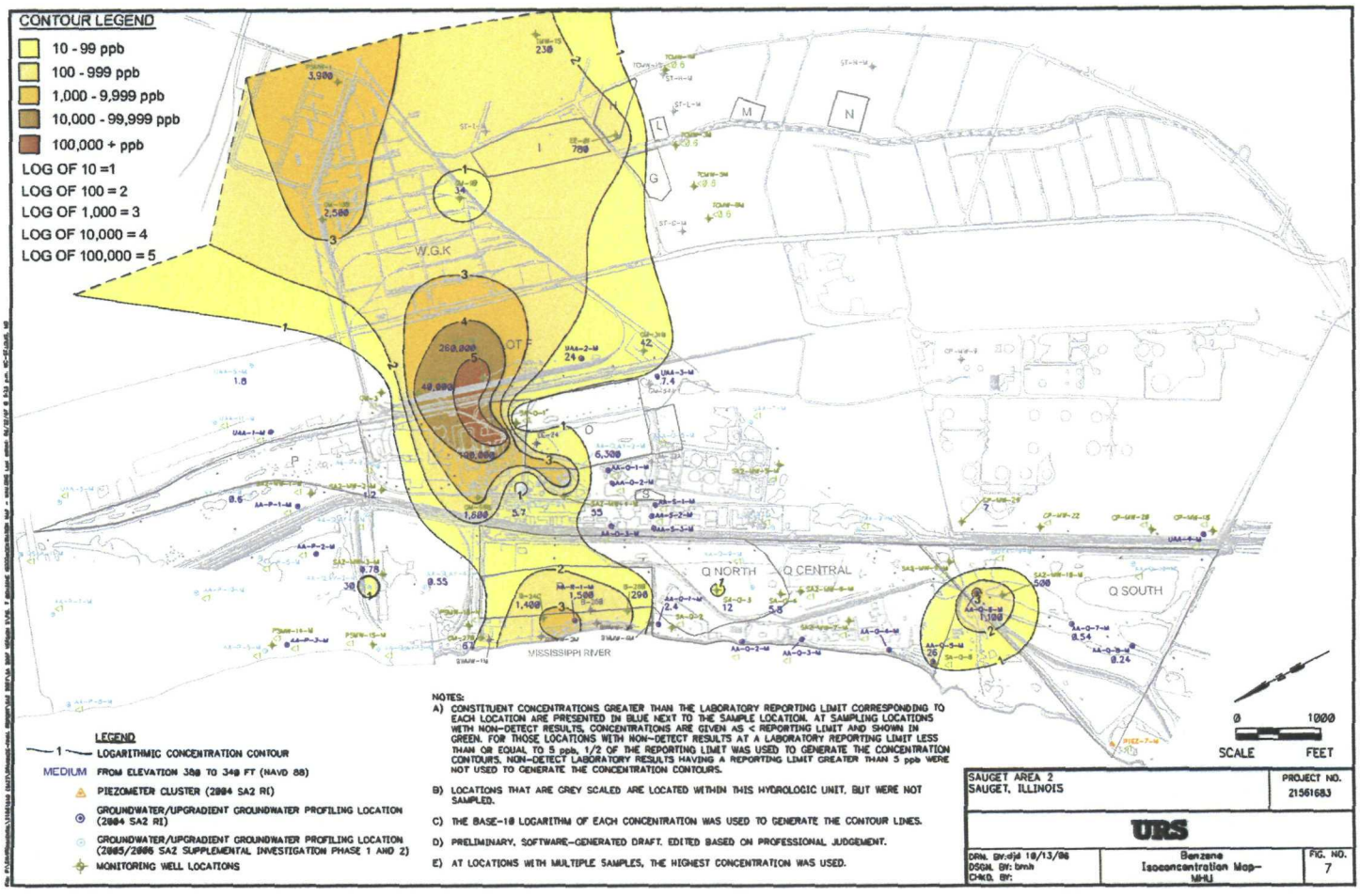
CONTOUR LEGEND
10 - 99 ppb
100 - 999 ppb
1,000 - 9,999 ppb
10,000 - 99,999 ppb
100,000 + ppb
LOG OF 10 =1
LOG OF 100 = 2
LOG OF 1,000 = 3
LOG OF 10,000 = 4
LOG OF 100,000 = 5
W.G.K
Q NORTH
Q CENTRAL
Q SOUTH
MISSISSIPPI RIVER
LEGEND
LOGARITHMIC CONCENTRATION CONTOUR
MEDIUM FROM ELEVATION 388 TO 348 FT (NAVD 88)
PIEZOMETER CLUSTER (2004 SA2 RI)
GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)
GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)
MONITORING WELL LOCATIONS
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A) CONSTITUENT CONCENTRATIONS GREATER THAN THE LABORATORY REPORTING LIMIT CORRESPONDING TO EACH LOCATION ARE PRESENTED IN BLUE NEXT TO THE SAMPLE LOCATION. AT SAMPLING LOCATIONS WITH NON-DETECT RESULTS, CONCENTRATIONS ARE GIVEN AS < REPORTING LIMIT AND SHOWN IN GREEN. FOR THOSE LOCATIONS WITH NON-DETECT RESULTS AT A LABORATORY REPORTING LIMIT LESS THAN OR EQUAL TO 5 ppb, 1/2 OF THE REPORTING LIMIT WAS USED TO GENERATE THE CONCENTRATION CONTOURS. NON-DETECT LABORATORY RESULTS HAVING A REPORTING LIMIT GREATER THAN 5 ppb WERE NOT USED TO GENERATE THE CONCENTRATION CONTOURS.
B) LOCATIONS THAT ARE GREY SCALED ARE LOCATED WITHIN THIS HYDROLOGIC UNIT, BUT WERE NOT SAMPLED.
C) THE BASE-10 LOGARITHM OF EACH CONCENTRATION WAS USED TO GENERATE THE CONTOUR LINES.
D) PRELIMINARY, SOFTWARE-GENERATED DRAFT, EDITED BASED ON PROFESSIONAL JUDGEMENT.
E) AT LOCATIONS WITH MULTIPLE SAMPLES, THE HIGHEST CONCENTRATION WAS USED.
0
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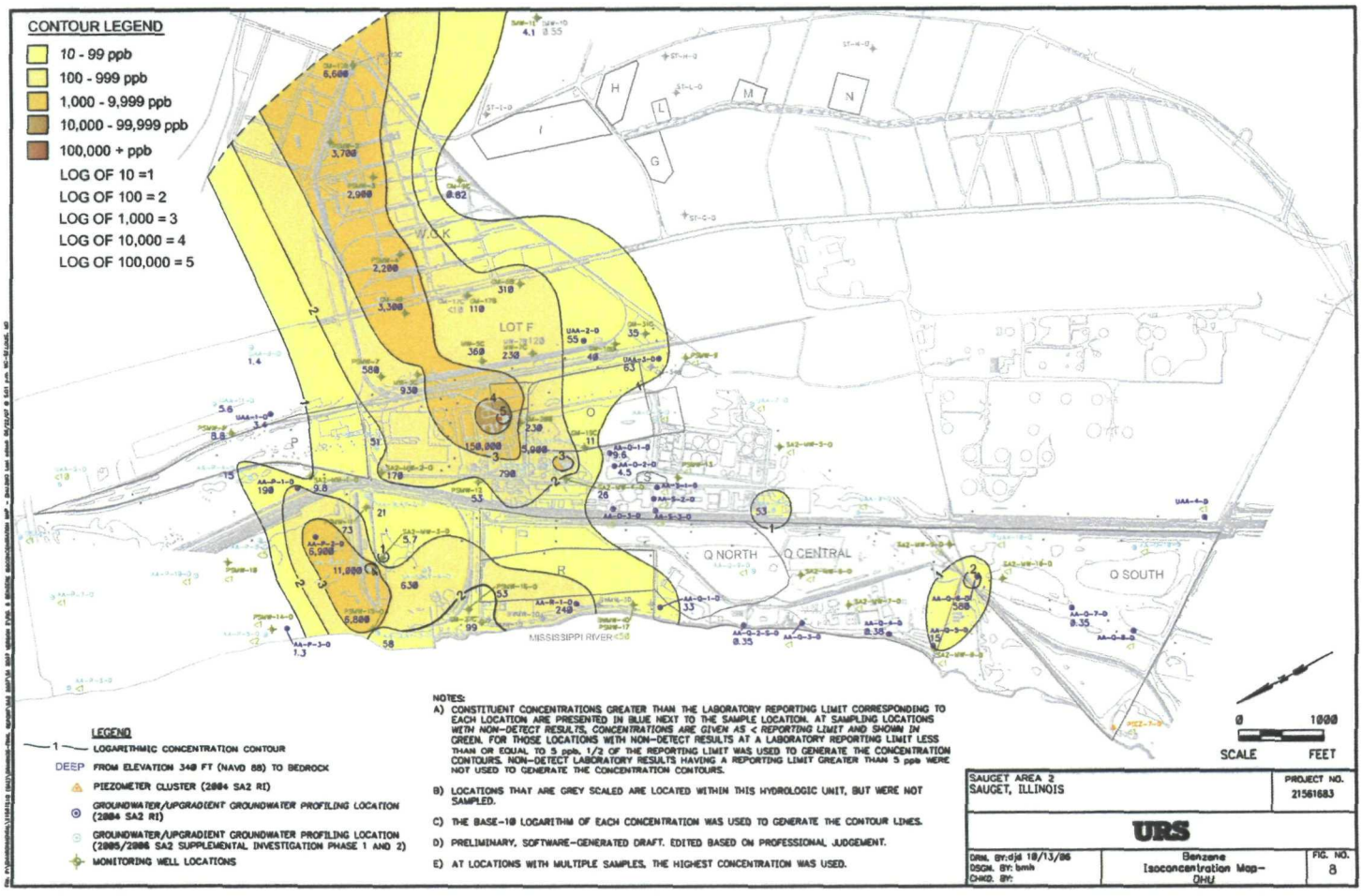
SCALE
FEET
SAUGET AREA 2
SAUGET, ILLINOIS
PROJECT NO.
21561683
URS
DRN. BY: djd 10/13/06
DSGN. BY: bmh
CHKD. BY:
Benzene
Isoconcentration Map-
MHU
FIG. NO.
7



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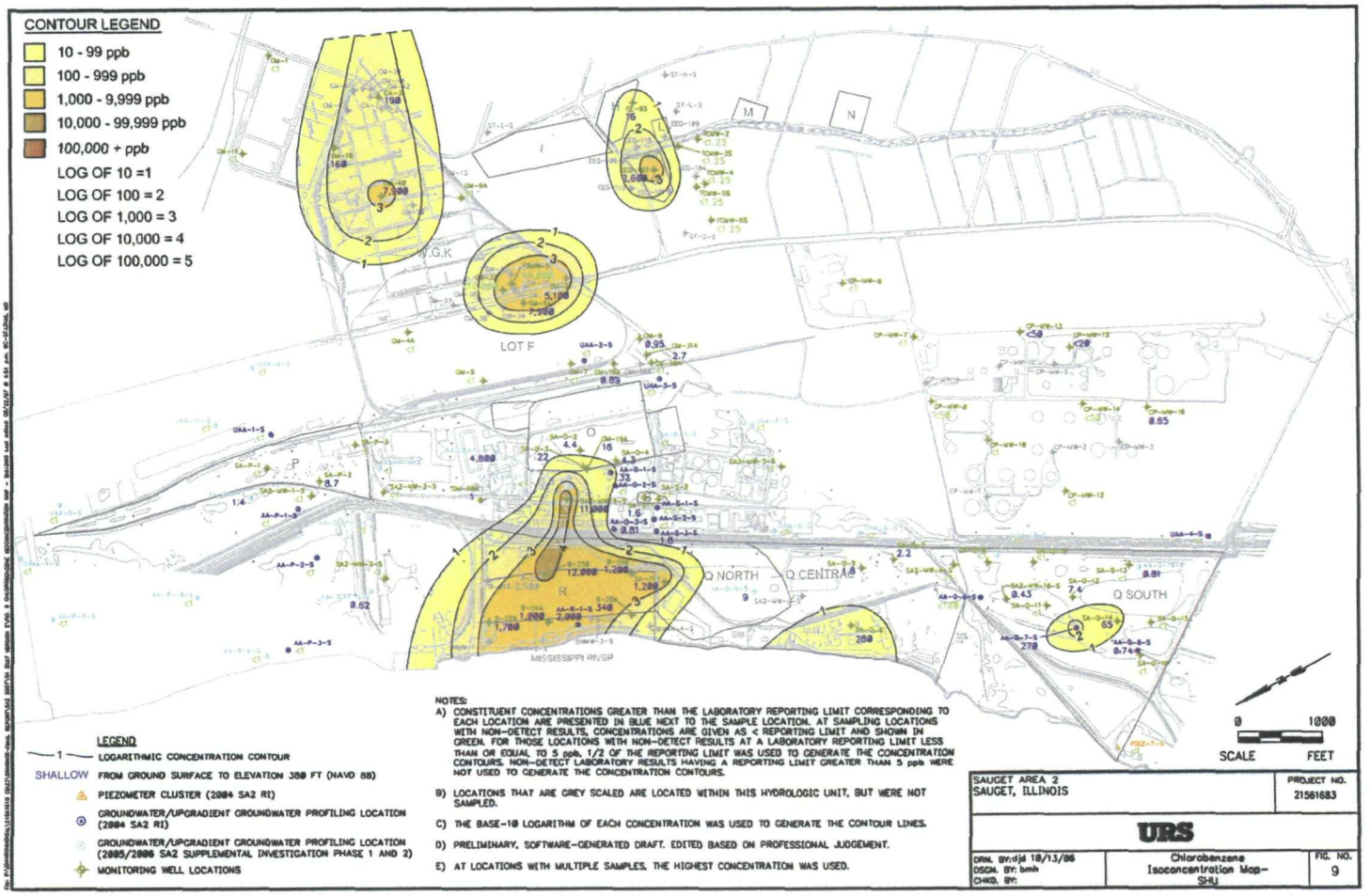
SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	Benzene Isoconcentration Map- QHU	FIG. NO. 8



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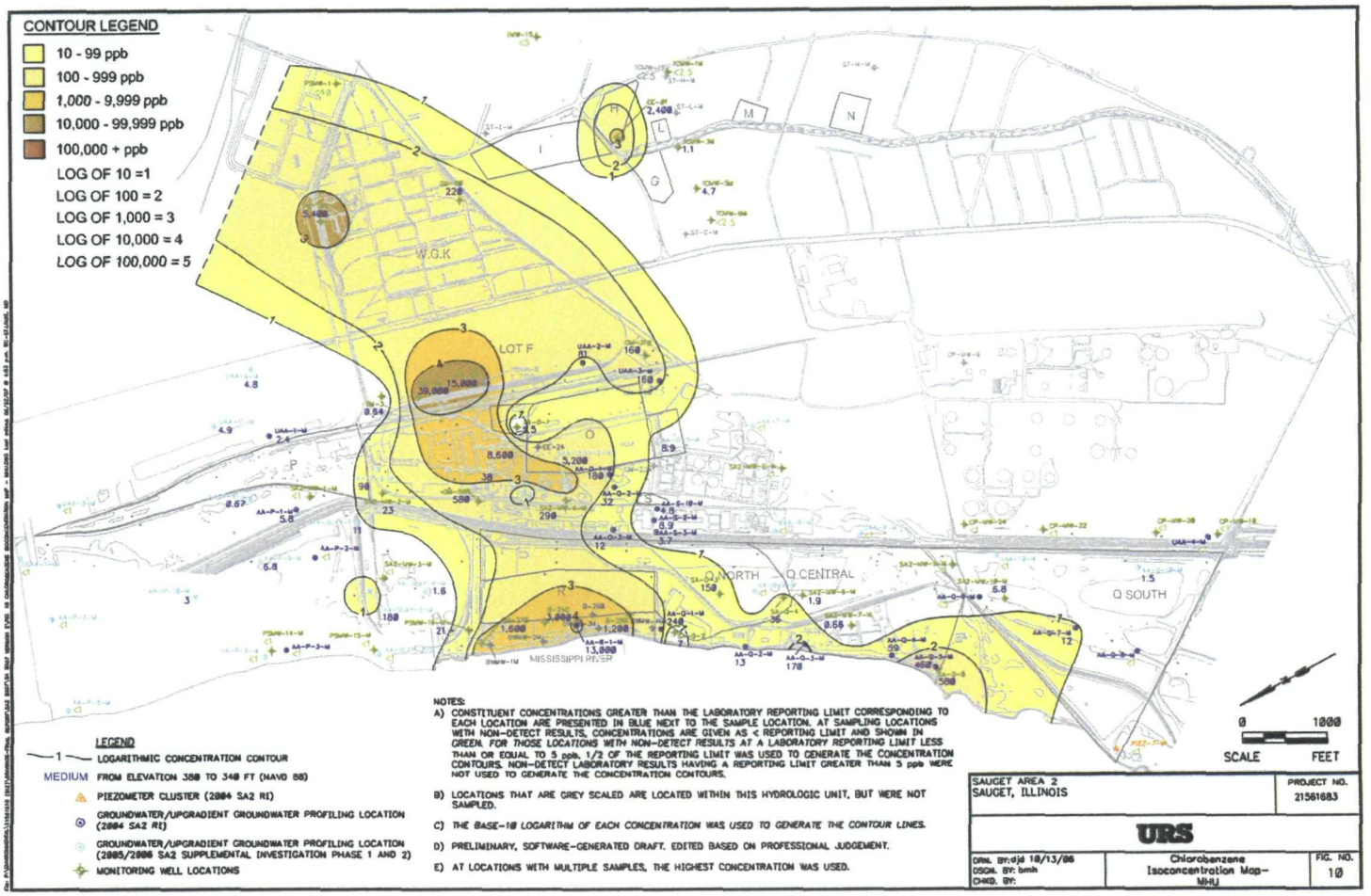
SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	Chlorobenzene Isoconcentration Map- SHU	FIG. NO. 9


CONTOUR LEGEND
10 - 99 ppb
100 - 999 ppb
1,000 - 9,999 ppb
10,000 - 99,999 ppb
100,000 + ppb
LOG OF 10 =1
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LOG OF 1,000 = 3
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LOG OF 100,000 = 5
W.G.K
LOT F
Q NORTH
Q CENTRAL
Q SOUTH
MISSISSIPPI RIVER
LEGEND
LOGARITHMIC CONCENTRATION CONTOUR
MEDIUM FROM ELEVATION 388 TO 348 FT (NAVD 88)
PIEZOMETER CLUSTER (2004 SA2 RI)
GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)
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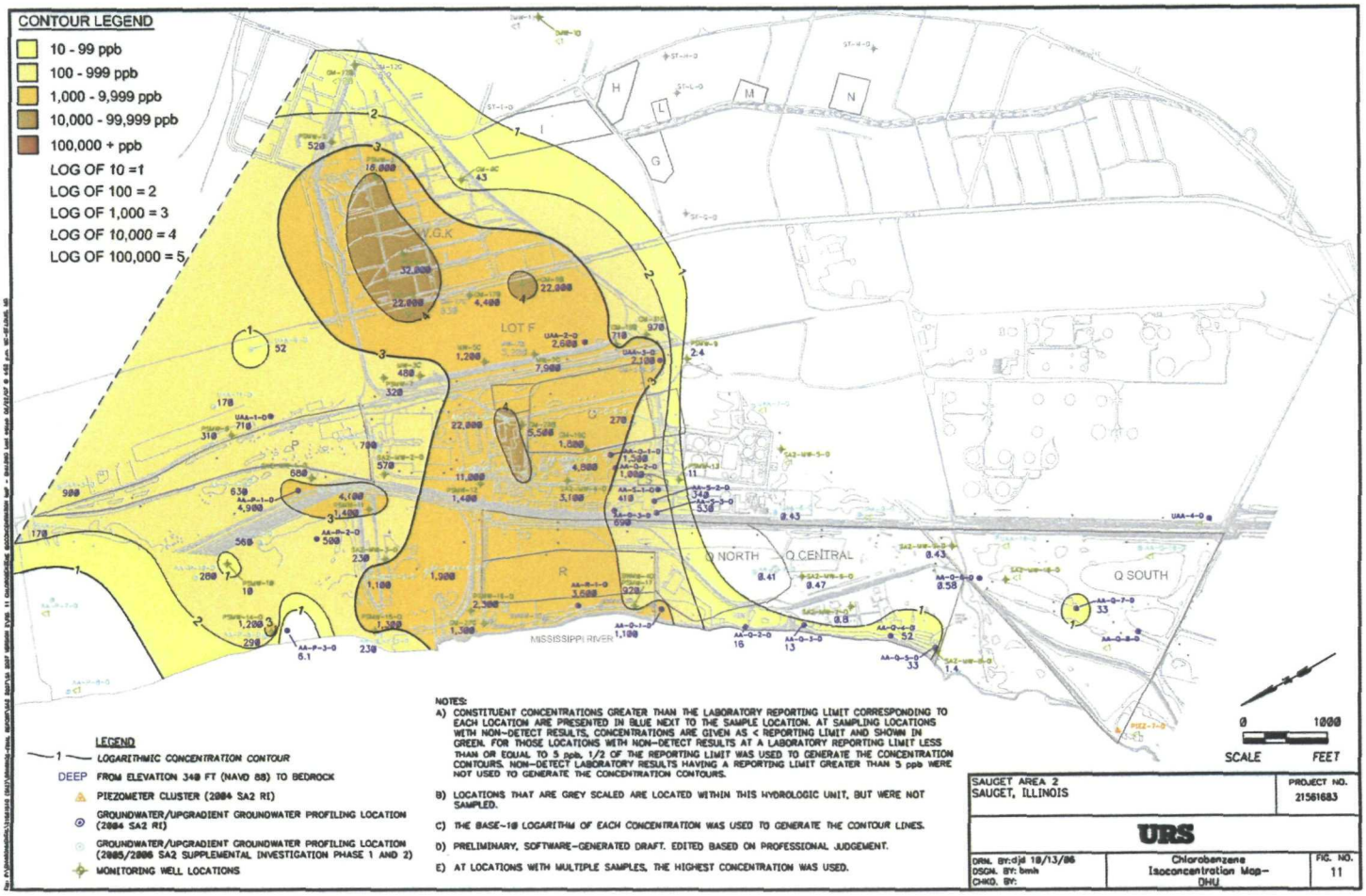
SAUGET AREA 2
SAUGET, ILLINOIS
PROJECT NO.
21561683
URS
DRN. BY: djd 10/13/06
DSGN. BY: bmh
CHKD. BY:
Chlorobenzene
Isoconcentration Map-
MHU
FIG. NO.
10


CONTOUR LEGEND
10 - 99 ppb
100 - 999 ppb
1,000 - 9,999 ppb
10,000 - 99,999 ppb
100,000 + ppb
LOG OF 10 =1
LOG OF 100 = 2
LOG OF 1,000 = 3
LOG OF 10,000 = 4
LOG OF 100,000 = 5
LOT F
Q NORTH
Q CENTRAL
Q SOUTH
MISSISSIPPI RIVER
LEGEND
LOGARITHMIC CONCENTRATION CONTOUR
DEEP FROM ELEVATION 340 FT (NAVD 88) TO BEDROCK
PIEZOMETER CLUSTER (2004 SA2 RI)
GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)
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SAUGET AREA 2
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PROJECT NO.
21561683
URS
DRN. BY: djd 10/13/06
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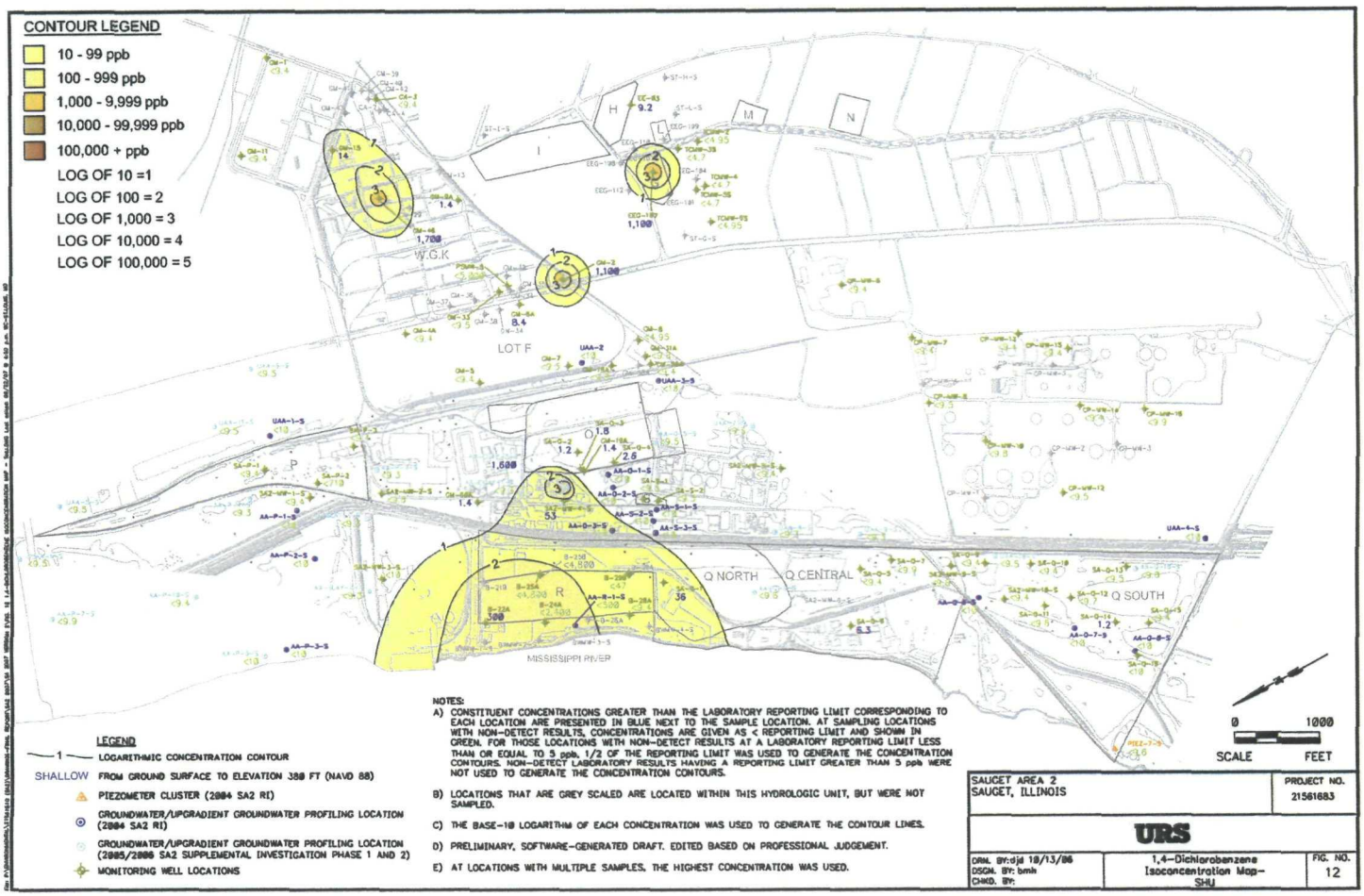
CHKD. BY:
Chlorobenzene
Isoconcentration Map-
DHU
FIG. NO.
11



LEGEND

1 — LOGARITHMIC CONCENTRATION CONTOUR

SHALLOW FROM GROUND SURFACE TO ELEVATION 388 FT (NAVD 88)

PIEZOMETER CLUSTER (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)

MONITORING WELL LOCATIONS

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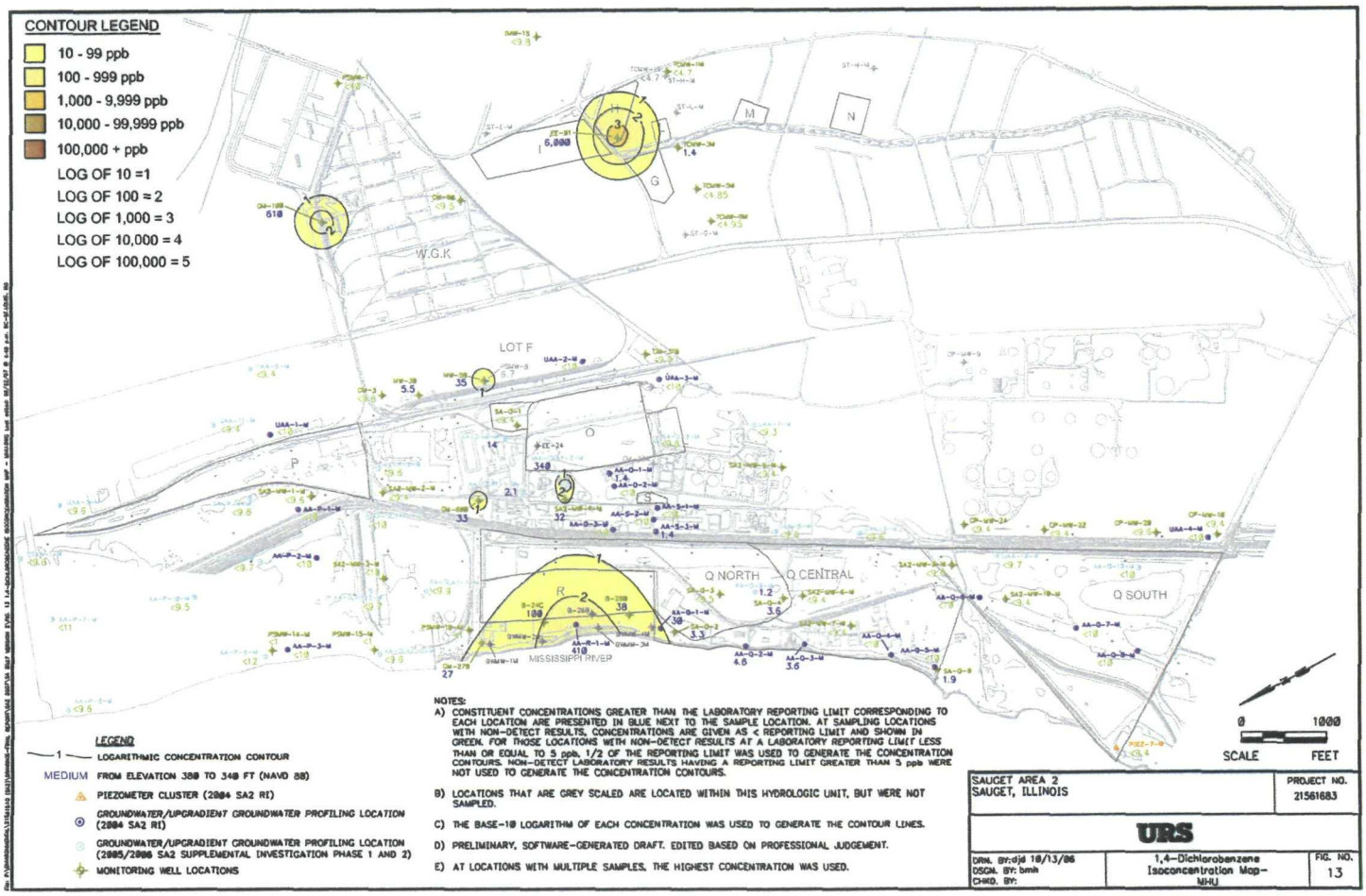
SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	1,4-Dichlorobenzene Isoconcentration Map- SHU	FIG. NO. 12



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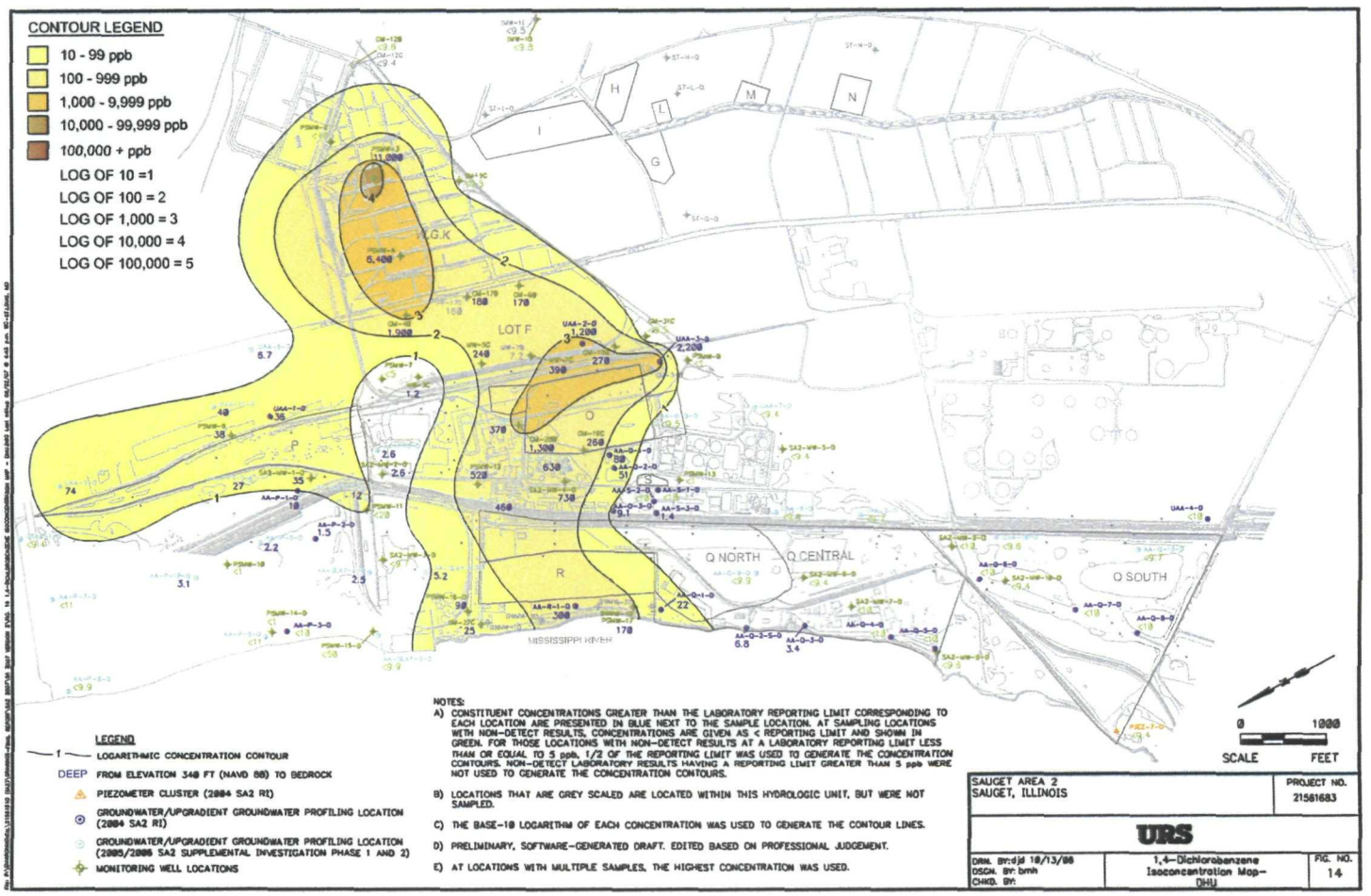
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	1,4-Dichlorobenzene Isoconcentration Map- MHU	FIG. NO. 13



LEGEND

1 — LOGARITHMIC CONCENTRATION CONTOUR

DEEP FROM ELEVATION 348 FT (NAVD 88) TO BEDROCK

PIEZOMETER CLUSTER (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)

MONITORING WELL LOCATIONS

NOTES:

A) CONSTITUENT CONCENTRATIONS GREATER THAN THE LABORATORY REPORTING LIMIT CORRESPONDING TO EACH LOCATION ARE PRESENTED IN BLUE NEXT TO THE SAMPLE LOCATION. AT SAMPLING LOCATIONS WITH NON-DETECT RESULTS, CONCENTRATIONS ARE GIVEN AS < REPORTING LIMIT AND SHOWN IN GREEN. FOR THOSE LOCATIONS WITH NON-DETECT RESULTS AT A LABORATORY REPORTING LIMIT LESS THAN OR EQUAL TO 5 ppb, 1/2 OF THE REPORTING LIMIT WAS USED TO GENERATE THE CONCENTRATION CONTOURS. NON-DETECT LABORATORY RESULTS HAVING A REPORTING LIMIT GREATER THAN 5 ppb WERE NOT USED TO GENERATE THE CONCENTRATION CONTOURS.

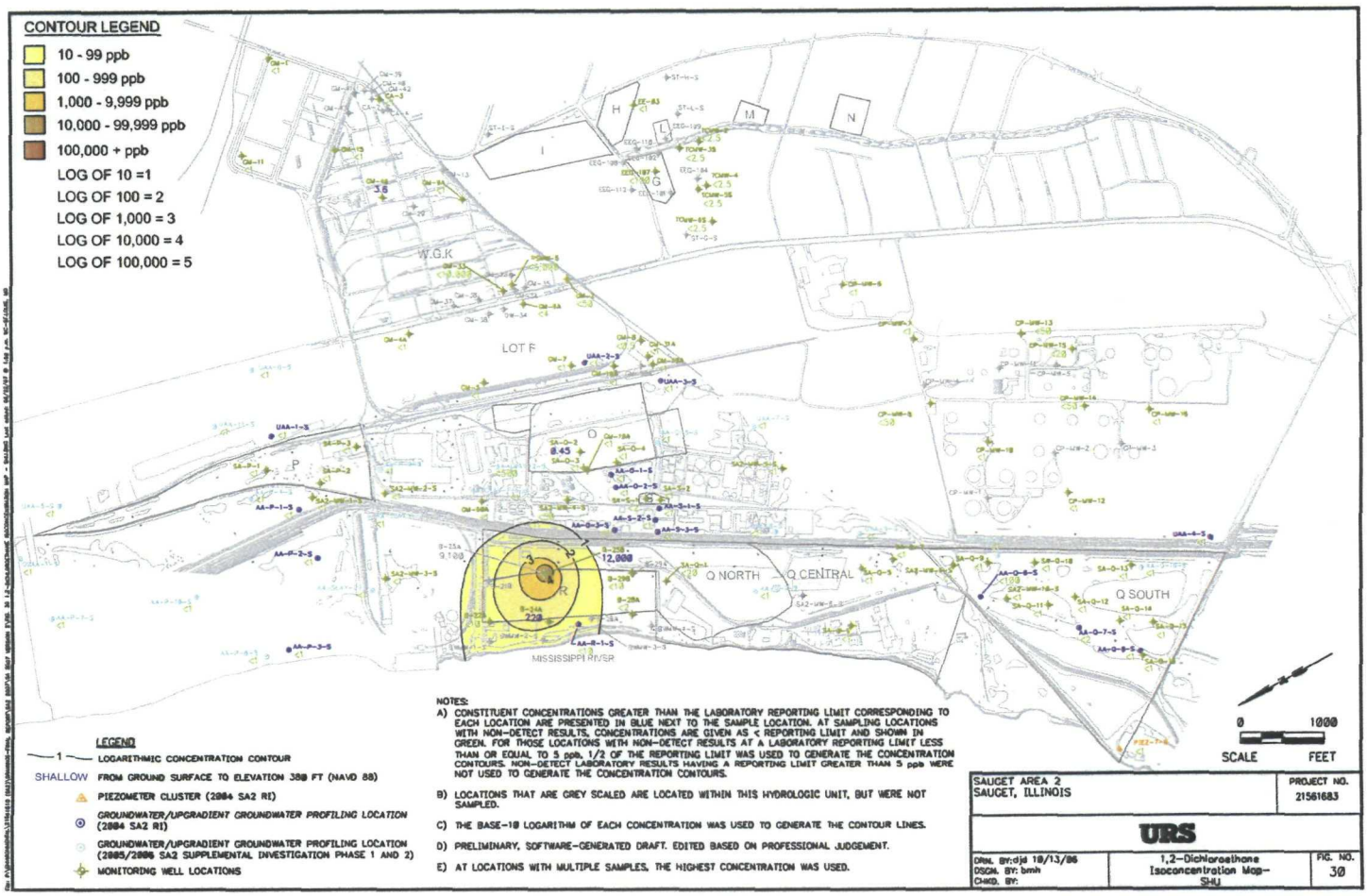
B) LOCATIONS THAT ARE GREY SCALED ARE LOCATED WITHIN THIS HYDROLOGIC UNIT, BUT WERE NOT SAMPLED.

C) THE BASE-10 LOGARITHM OF EACH CONCENTRATION WAS USED TO GENERATE THE CONTOUR LINES.

D) PRELIMINARY, SOFTWARE-GENERATED DRAFT. EDITED BASED ON PROFESSIONAL JUDGEMENT.

E) AT LOCATIONS WITH MULTIPLE SAMPLES, THE HIGHEST CONCENTRATION WAS USED.

SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21581683
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	1,4-Dichlorobenzene Isoconcentration Map- OHU	FIG. NO. 14



LEGEND

—1— LOGARITHMIC CONCENTRATION CONTOUR

SHALLOW FROM GROUND SURFACE TO ELEVATION 388 FT (NAVD 88)

PIEZOMETER CLUSTER (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)

MONITORING WELL LOCATIONS

NOTES:

A) CONSTITUENT CONCENTRATIONS GREATER THAN THE LABORATORY REPORTING LIMIT CORRESPONDING TO EACH LOCATION ARE PRESENTED IN BLUE NEXT TO THE SAMPLE LOCATION. AT SAMPLING LOCATIONS WITH NON-DETECT RESULTS, CONCENTRATIONS ARE GIVEN AS < REPORTING LIMIT AND SHOWN IN GREEN. FOR THOSE LOCATIONS WITH NON-DETECT RESULTS AT A LABORATORY REPORTING LIMIT LESS THAN OR EQUAL TO 5 ppb, 1/2 OF THE REPORTING LIMIT WAS USED TO GENERATE THE CONCENTRATION CONTOURS. NON-DETECT LABORATORY RESULTS HAVING A REPORTING LIMIT GREATER THAN 5 ppb WERE NOT USED TO GENERATE THE CONCENTRATION CONTOURS.

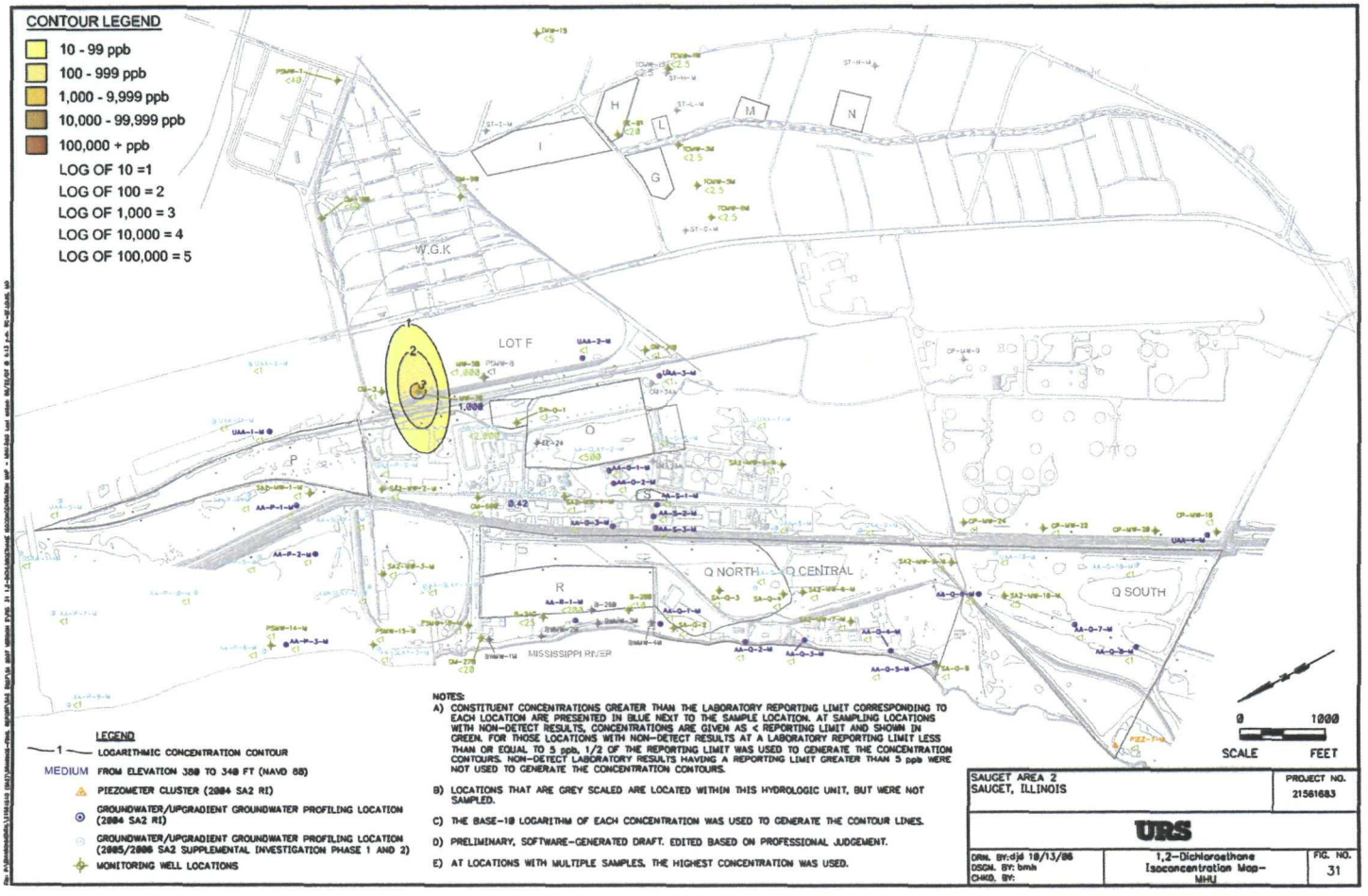
B) LOCATIONS THAT ARE GREY SCALED ARE LOCATED WITHIN THIS HYDROLOGIC UNIT, BUT WERE NOT SAMPLED.

C) THE BASE-10 LOGARITHM OF EACH CONCENTRATION WAS USED TO GENERATE THE CONTOUR LINES.

D) PRELIMINARY, SOFTWARE-GENERATED DRAFT. EDITED BASED ON PROFESSIONAL JUDGEMENT.

E) AT LOCATIONS WITH MULTIPLE SAMPLES, THE HIGHEST CONCENTRATION WAS USED.

SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	1,2-Dichloroethane Isoconcentration Map- SHU	FIG. NO. 30



LEGEND

1 — LOGARITHMIC CONCENTRATION CONTOUR

MEDIUM FROM ELEVATION 388 TO 348 FT (NAVD 88)

PIEZOMETER CLUSTER (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)

MONITORING WELL LOCATIONS

NOTES:

A) CONSTITUENT CONCENTRATIONS GREATER THAN THE LABORATORY REPORTING LIMIT CORRESPONDING TO EACH LOCATION ARE PRESENTED IN BLUE NEXT TO THE SAMPLE LOCATION. AT SAMPLING LOCATIONS WITH NON-DETECT RESULTS, CONCENTRATIONS ARE GIVEN AS < REPORTING LIMIT AND SHOWN IN GREEN. FOR THOSE LOCATIONS WITH NON-DETECT RESULTS AT A LABORATORY REPORTING LIMIT LESS THAN OR EQUAL TO 5 ppb, 1/2 OF THE REPORTING LIMIT WAS USED TO GENERATE THE CONCENTRATION CONTOURS. NON-DETECT LABORATORY RESULTS HAVING A REPORTING LIMIT GREATER THAN 5 ppb WERE NOT USED TO GENERATE THE CONCENTRATION CONTOURS.

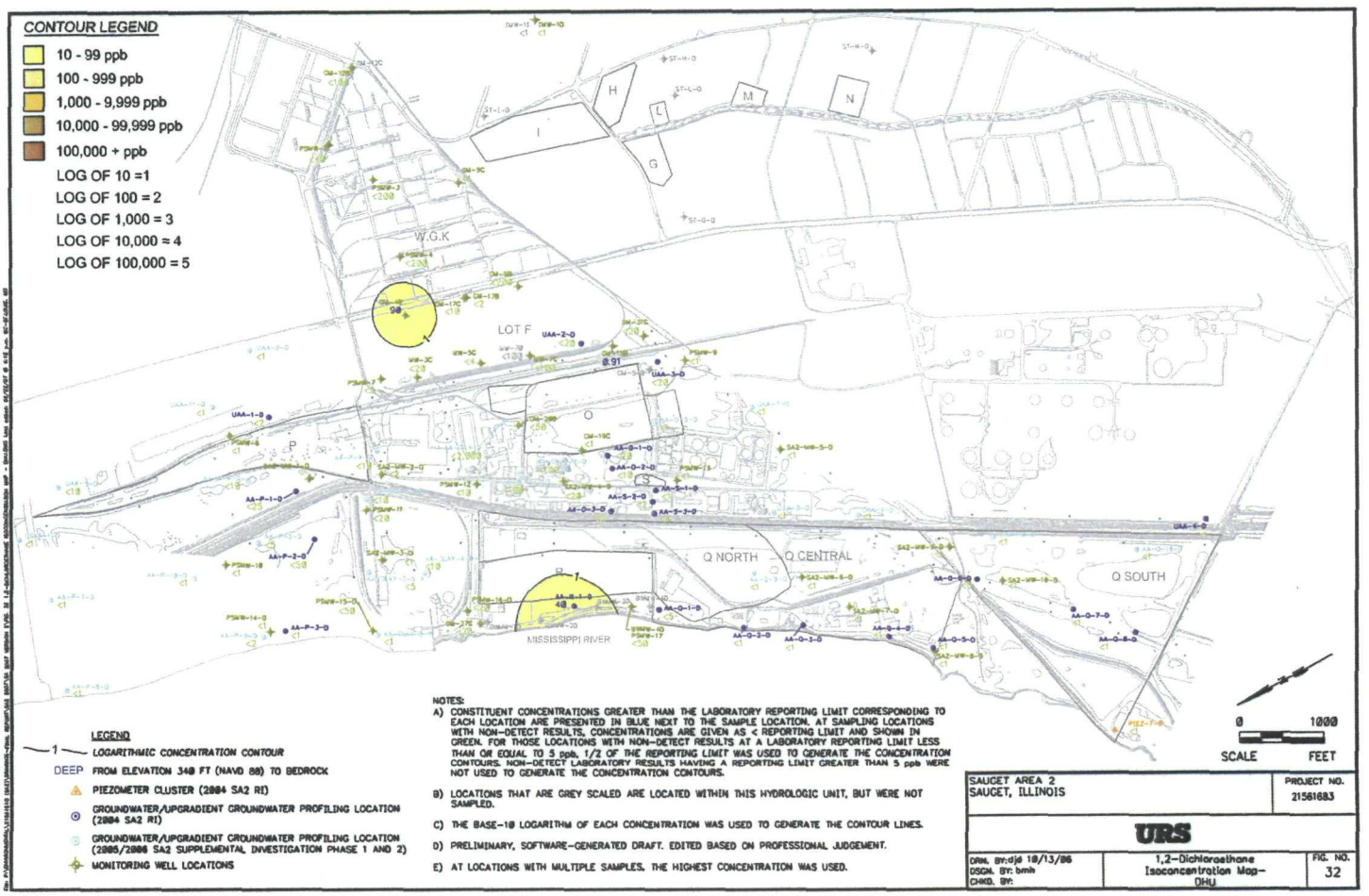
B) LOCATIONS THAT ARE GREY SCALED ARE LOCATED WITHIN THIS HYDROLOGIC UNIT, BUT WERE NOT SAMPLED.

C) THE BASE-10 LOGARITHM OF EACH CONCENTRATION WAS USED TO GENERATE THE CONTOUR LINES.

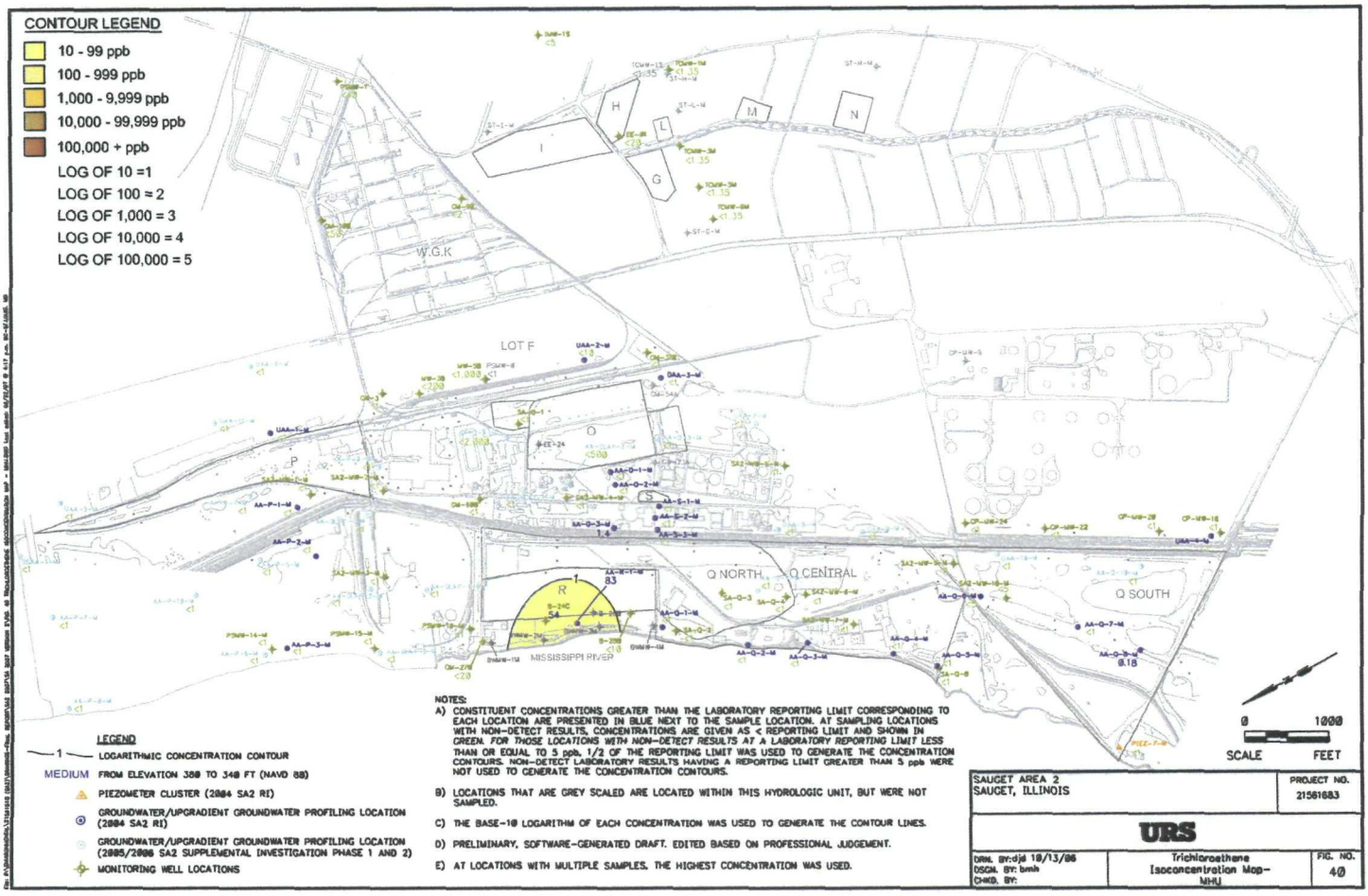
D) PRELIMINARY, SOFTWARE-GENERATED DRAFT. EDITED BASED ON PROFESSIONAL JUDGEMENT.

E) AT LOCATIONS WITH MULTIPLE SAMPLES, THE HIGHEST CONCENTRATION WAS USED.

SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	1,2-Dichloroethane Isoconcentration Map- MHU	FIG. NO. 31



SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	1,2-Dichloroethane Isoconcentration Map- OHU	FIG. NO. 32



LEGEND

—1— LOGARITHMIC CONCENTRATION CONTOUR

MEDIUM FROM ELEVATION 380 TO 340 FT (NAVD 88)

PIEZOMETER CLUSTER (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)

MONITORING WELL LOCATIONS

NOTES:

A) CONSTITUENT CONCENTRATIONS GREATER THAN THE LABORATORY REPORTING LIMIT CORRESPONDING TO EACH LOCATION ARE PRESENTED IN BLUE NEXT TO THE SAMPLE LOCATION. AT SAMPLING LOCATIONS WITH NON-DETECT RESULTS, CONCENTRATIONS ARE GIVEN AS < REPORTING LIMIT AND SHOWN IN GREEN. FOR THOSE LOCATIONS WITH NON-DETECT RESULTS AT A LABORATORY REPORTING LIMIT LESS THAN OR EQUAL TO 5 ppb, 1/2 OF THE REPORTING LIMIT WAS USED TO GENERATE THE CONCENTRATION CONTOURS. NON-DETECT LABORATORY RESULTS HAVING A REPORTING LIMIT GREATER THAN 5 ppb WERE NOT USED TO GENERATE THE CONCENTRATION CONTOURS.

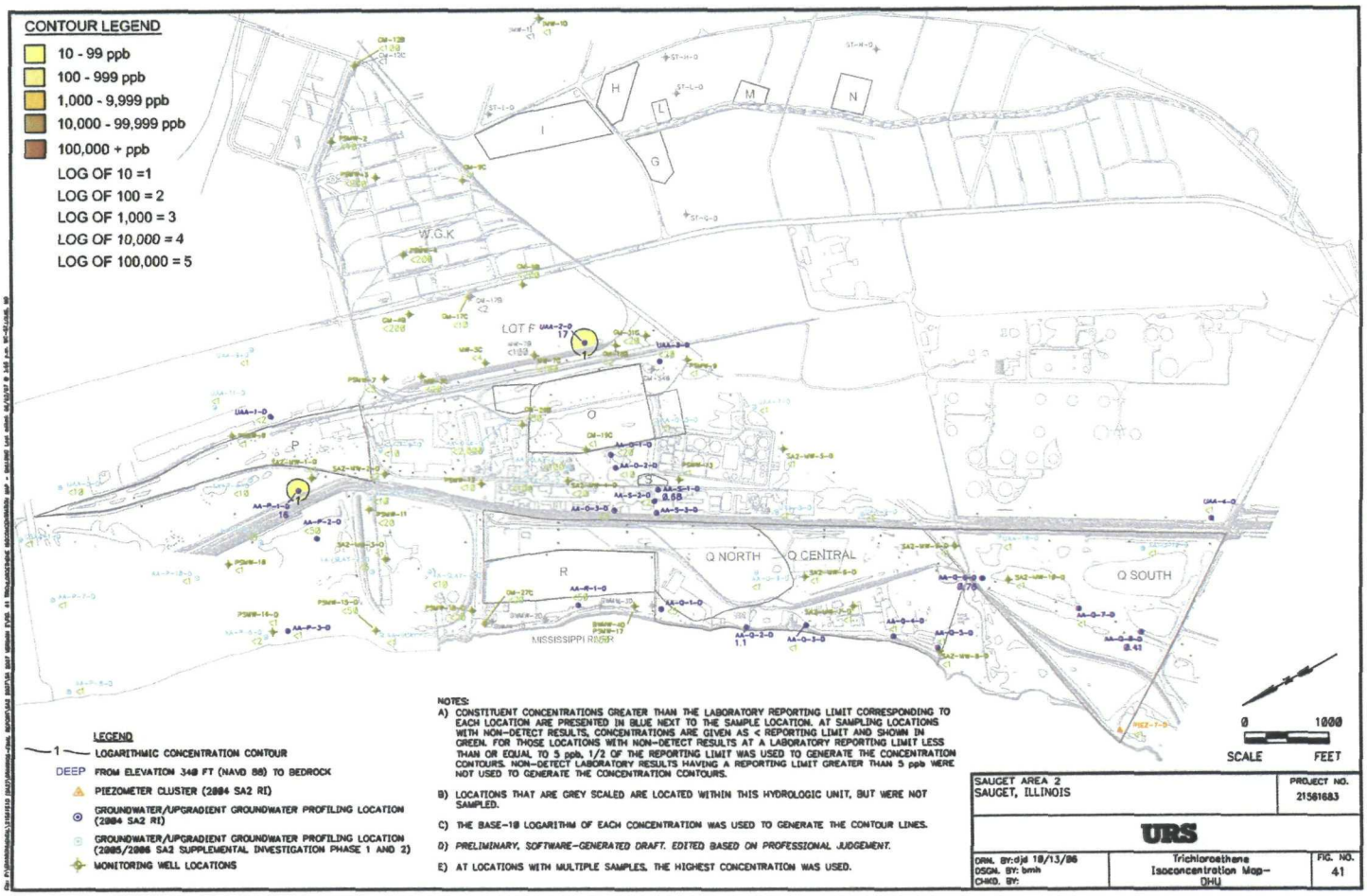
B) LOCATIONS THAT ARE GREY SCALED ARE LOCATED WITHIN THIS HYDROLOGIC UNIT, BUT WERE NOT SAMPLED.

C) THE BASE-10 LOGARITHM OF EACH CONCENTRATION WAS USED TO GENERATE THE CONTOUR LINES.

D) PRELIMINARY, SOFTWARE-GENERATED DRAFT. EDITED BASED ON PROFESSIONAL JUDGEMENT.

E) AT LOCATIONS WITH MULTIPLE SAMPLES, THE HIGHEST CONCENTRATION WAS USED.

SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	Trichloroethene Isoconcentration Map- MHU	FIG. NO. 40



LEGEND

1 — LOGARITHMIC CONCENTRATION CONTOUR

DEEP FROM ELEVATION 340 FT (NAVD 88) TO BEDROCK

PIEZOMETER CLUSTER (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)

MONITORING WELL LOCATIONS

NOTES:

A) CONSTITUENT CONCENTRATIONS GREATER THAN THE LABORATORY REPORTING LIMIT CORRESPONDING TO EACH LOCATION ARE PRESENTED IN BLUE NEXT TO THE SAMPLE LOCATION. AT SAMPLING LOCATIONS WITH NON-DETECT RESULTS, CONCENTRATIONS ARE GIVEN AS < REPORTING LIMIT AND SHOWN IN GREEN. FOR THOSE LOCATIONS WITH NON-DETECT RESULTS AT A LABORATORY REPORTING LIMIT LESS THAN OR EQUAL TO 5 ppb, 1/2 OF THE REPORTING LIMIT WAS USED TO GENERATE THE CONCENTRATION CONTOURS. NON-DETECT LABORATORY RESULTS HAVING A REPORTING LIMIT GREATER THAN 5 ppb WERE NOT USED TO GENERATE THE CONCENTRATION CONTOURS.

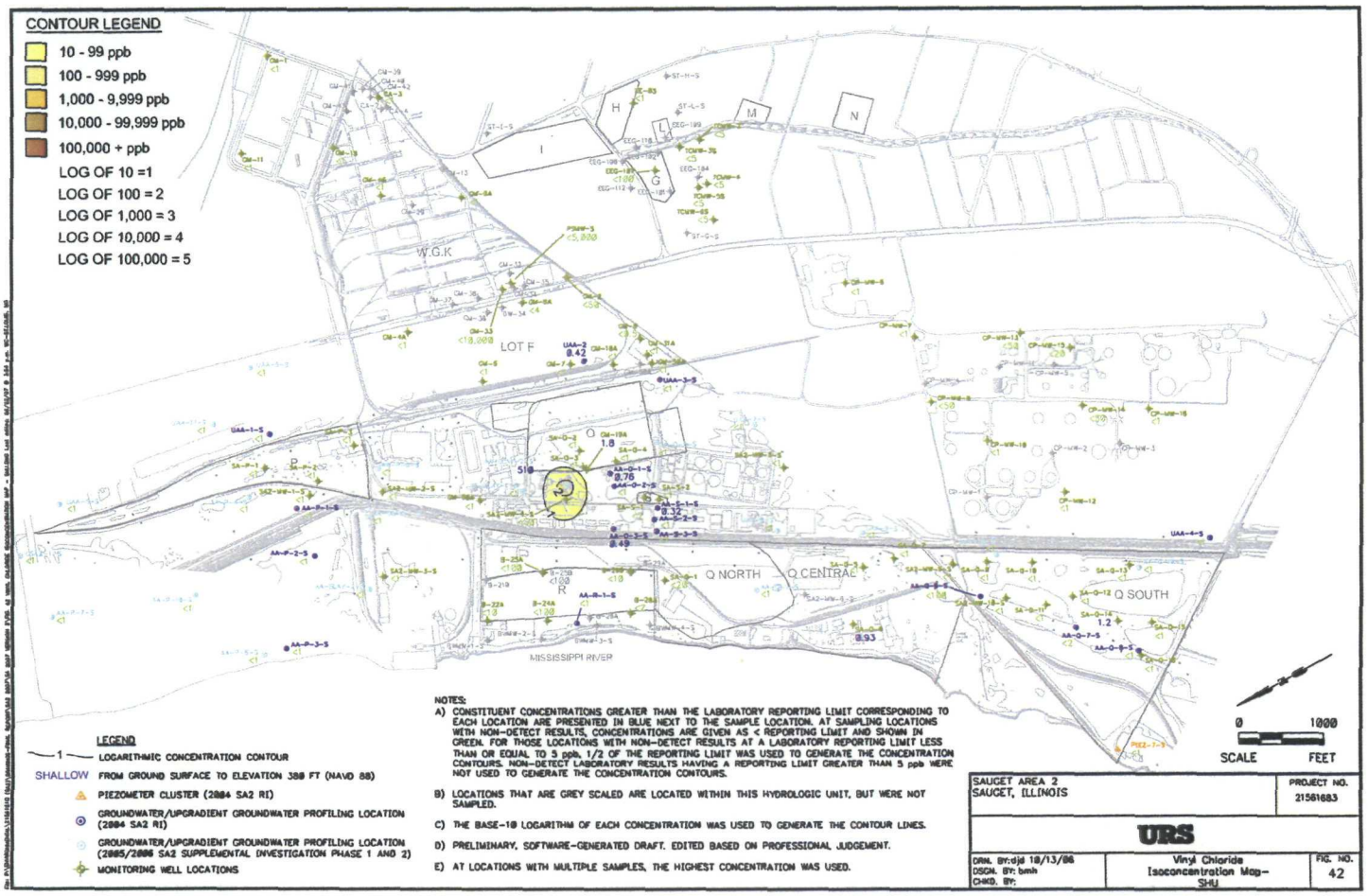
B) LOCATIONS THAT ARE GREY SCALED ARE LOCATED WITHIN THIS HYDROLOGIC UNIT, BUT WERE NOT SAMPLED.

C) THE BASE-10 LOGARITHM OF EACH CONCENTRATION WAS USED TO GENERATE THE CONTOUR LINES.

D) *PRELIMINARY, SOFTWARE-GENERATED DRAFT. EDITED BASED ON PROFESSIONAL JUDGEMENT.*

E) AT LOCATIONS WITH MULTIPLE SAMPLES, THE HIGHEST CONCENTRATION WAS USED.

SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: djl 10/13/06 DSGN. BY: bmh CHKD. BY:	Trichloroethene Isoconcentration Map- OHU	FIG. NO. 41



LEGEND

1 — LOGARITHMIC CONCENTRATION CONTOUR

SHALLOW FROM GROUND SURFACE TO ELEVATION 388 FT (NAVD 88)

PIEZOMETER CLUSTER (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)

MONITORING WELL LOCATIONS

NOTES:

A) CONSTITUENT CONCENTRATIONS GREATER THAN THE LABORATORY REPORTING LIMIT CORRESPONDING TO EACH LOCATION ARE PRESENTED IN BLUE NEXT TO THE SAMPLE LOCATION. AT SAMPLING LOCATIONS WITH NON-DETECT RESULTS, CONCENTRATIONS ARE GIVEN AS < REPORTING LIMIT AND SHOWN IN GREEN. FOR THOSE LOCATIONS WITH NON-DETECT RESULTS AT A LABORATORY REPORTING LIMIT LESS THAN OR EQUAL TO 5 ppb, 1/2 OF THE REPORTING LIMIT WAS USED TO GENERATE THE CONCENTRATION CONTOURS. NON-DETECT LABORATORY RESULTS HAVING A REPORTING LIMIT GREATER THAN 5 ppb WERE NOT USED TO GENERATE THE CONCENTRATION CONTOURS.

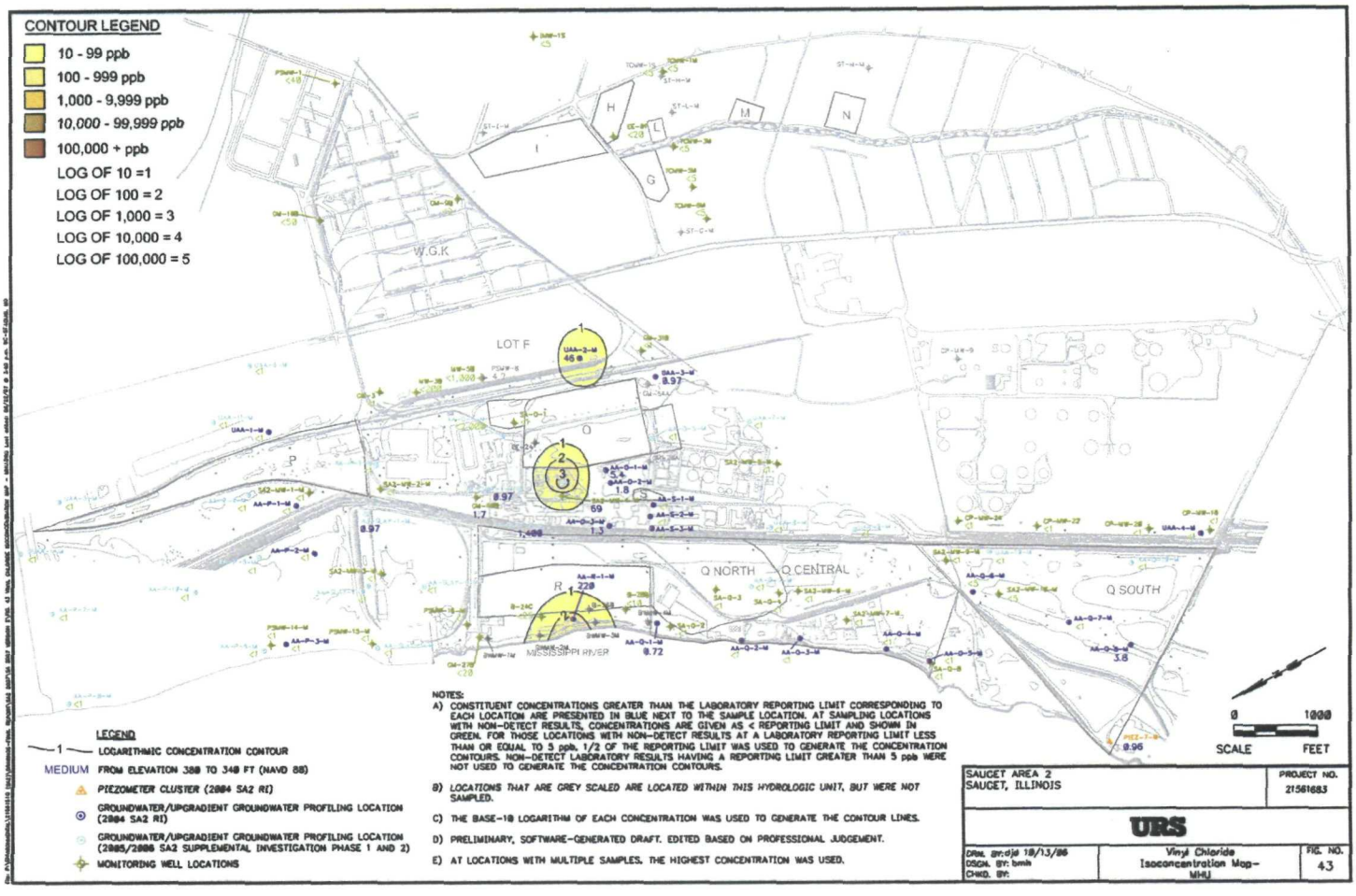
B) LOCATIONS THAT ARE GREY SCALED ARE LOCATED WITHIN THIS HYDROLOGIC UNIT, BUT WERE NOT SAMPLED.

C) THE BASE-10 LOGARITHM OF EACH CONCENTRATION WAS USED TO GENERATE THE CONTOUR LINES.

D) PRELIMINARY, SOFTWARE-GENERATED DRAFT. EDITED BASED ON PROFESSIONAL JUDGEMENT.

E) AT LOCATIONS WITH MULTIPLE SAMPLES, THE HIGHEST CONCENTRATION WAS USED.

SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	Vinyl Chloride Isoconcentration Map- SHU	FIG. NO. 42



LEGEND

—1— LOGARITHMIC CONCENTRATION CONTOUR

MEDIUM FROM ELEVATION 380 TO 340 FT (NAVD 88)

PIEZOMETER CLUSTER (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)

GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)

MONITORING WELL LOCATIONS

NOTES:

A) CONSTITUENT CONCENTRATIONS GREATER THAN THE LABORATORY REPORTING LIMIT CORRESPONDING TO EACH LOCATION ARE PRESENTED IN BLUE NEXT TO THE SAMPLE LOCATION. AT SAMPLING LOCATIONS WITH NON-DETECT RESULTS, CONCENTRATIONS ARE GIVEN AS < REPORTING LIMIT AND SHOWN IN GREEN. FOR THOSE LOCATIONS WITH NON-DETECT RESULTS AT A LABORATORY REPORTING LIMIT LESS THAN OR EQUAL TO 5 ppb, 1/2 OF THE REPORTING LIMIT WAS USED TO GENERATE THE CONCENTRATION CONTOURS. NON-DETECT LABORATORY RESULTS HAVING A REPORTING LIMIT GREATER THAN 5 ppb WERE NOT USED TO GENERATE THE CONCENTRATION CONTOURS.

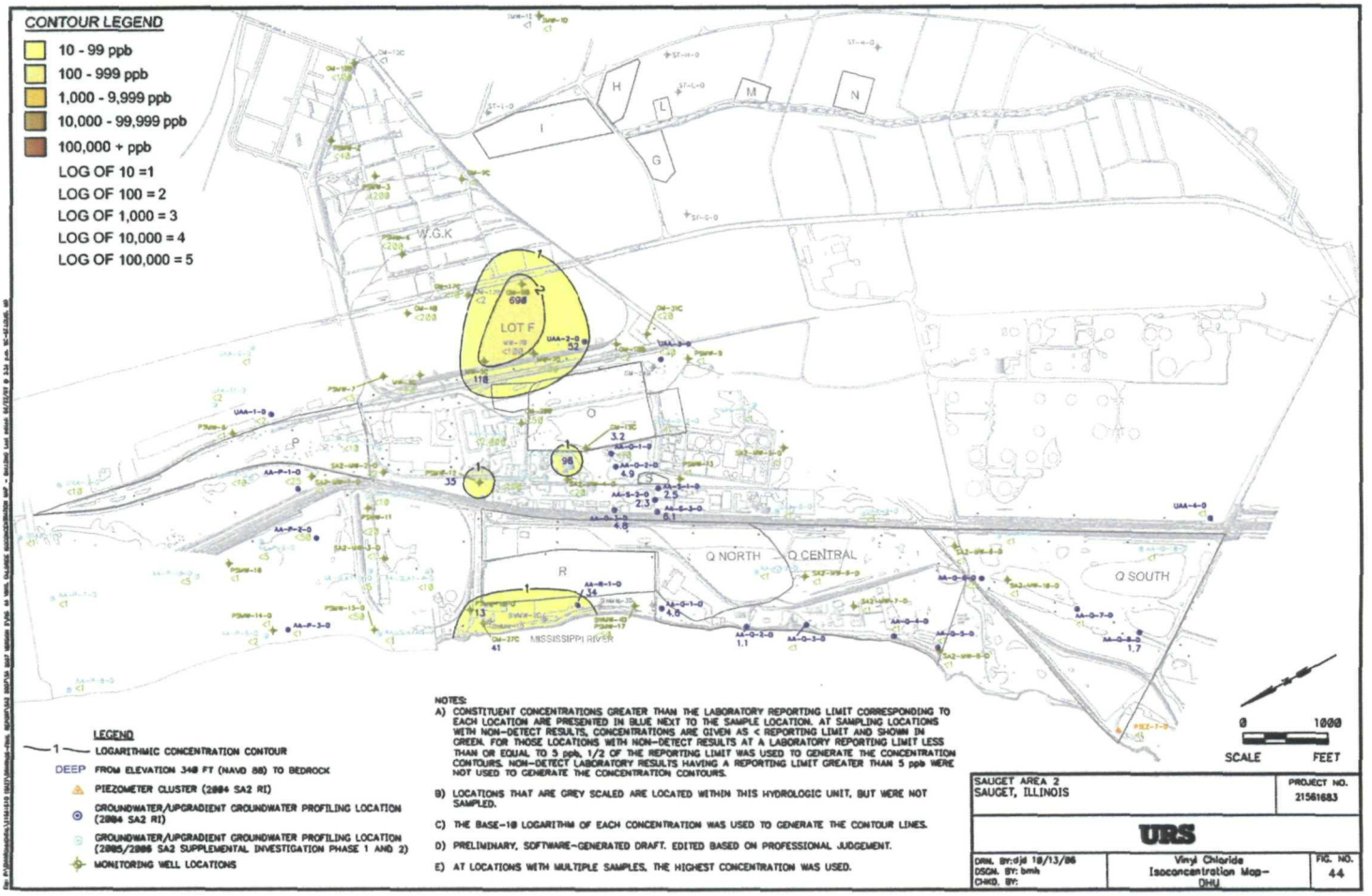
B) LOCATIONS THAT ARE GREY SCALED ARE LOCATED WITHIN THIS HYDROLOGIC UNIT, BUT WERE NOT SAMPLED.

C) THE BASE-10 LOGARITHM OF EACH CONCENTRATION WAS USED TO GENERATE THE CONTOUR LINES.

D) PRELIMINARY, SOFTWARE-GENERATED DRAFT. EDITED BASED ON PROFESSIONAL JUDGEMENT.

E) AT LOCATIONS WITH MULTIPLE SAMPLES, THE HIGHEST CONCENTRATION WAS USED.

SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683
URS		
DRN. BY: cjd 10/13/06 DSGN. BY: bmh CHKD. BY:	Vinyl Chloride Isoconcentration Map- MHU	FIG. NO. 4.3


CONTOUR LEGEND
10 - 99 ppb
100 - 999 ppb
1,000 - 9,999 ppb
10,000 - 99,999 ppb
100,000 + ppb
LOG OF 10 =1
LOG OF 100 = 2
LOG OF 1,000 = 3
LOG OF 10,000 = 4
LOG OF 100,000 = 5
W.G.K
LOT F
Q NORTH
Q CENTRAL
Q SOUTH
MISSISSIPPI RIVER
H
I
L
M
N
G
O
P
R
LEGEND
LOGARITHMIC CONCENTRATION CONTOUR
DEEP FROM ELEVATION 348 FT (NAVD 88) TO BEDROCK
PIEZOMETER CLUSTER (2004 SA2 RI)
GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)
GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005/2006 SA2 SUPPLEMENTAL INVESTIGATION PHASE 1 AND 2)
MONITORING WELL LOCATIONS
NOTES:
A) CONSTITUENT CONCENTRATIONS GREATER THAN THE LABORATORY REPORTING LIMIT CORRESPONDING TO EACH LOCATION ARE PRESENTED IN BLUE NEXT TO THE SAMPLE LOCATION. AT SAMPLING LOCATIONS WITH NON-DETECT RESULTS, CONCENTRATIONS ARE GIVEN AS < REPORTING LIMIT AND SHOWN IN GREEN. FOR THOSE LOCATIONS WITH NON-DETECT RESULTS AT A LABORATORY REPORTING LIMIT LESS THAN OR EQUAL TO 5 ppb, 1/2 OF THE REPORTING LIMIT WAS USED TO GENERATE THE CONCENTRATION CONTOURS. NON-DETECT LABORATORY RESULTS HAVING A REPORTING LIMIT GREATER THAN 5 ppb WERE NOT USED TO GENERATE THE CONCENTRATION CONTOURS.
B) LOCATIONS THAT ARE GREY SCALED ARE LOCATED WITHIN THIS HYDROLOGIC UNIT, BUT WERE NOT SAMPLED.
C) THE BASE-10 LOGARITHM OF EACH CONCENTRATION WAS USED TO GENERATE THE CONTOUR LINES.
D) PRELIMINARY, SOFTWARE-GENERATED DRAFT. EDITED BASED ON PROFESSIONAL JUDGEMENT.
E) AT LOCATIONS WITH MULTIPLE SAMPLES, THE HIGHEST CONCENTRATION WAS USED.
0
1000
SCALE
FEET
SAUGET AREA 2
SAUGET, ILLINOIS
PROJECT NO.
21561683
URS
DRN. BY: djd 10/13/06
DSGN. BY: bmh
CHKD. BY:
Vinyl Chloride
Isoconcentration Map-
DHU
FIG. NO.
44

File: P:\ENVIRONMENTAL\21561510 (SA2)\DRAWINGS-FINAL REPORT\SA2 2006\FIG. 1 SITE MAP.DWG Last edited: 10/11/06 @ 1:43 p.m. WC-ST.LOUIS, MO

R1AU R1AM R1AD R1BU R1BM R1BD R1CM

LEGEND

- OFFSITE SOIL SAMPLING LOCATION (2004 SA2 RI)
- GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2004 SA2 RI)
- BEDROCK MONITORING WELL (2004 SA2 RI/SA1)
- PIEZOMETER CLUSTER (2004 SA2 RI)
- AIR SAMPLING LOCATION (2004 SA2 RI)
- BOUNDARY TRENCH LOCATION (2004 SA2 RI)
- ANOMALY TRENCH LOCATION (2004 SA2 RI)
- SOIL/WASTE CHARACTERIZATION BORING LOCATION (2004 SA2 RI)
- LEACHATE MONITORING WELL LOCATION (2004 SA2 RI)
- SURFACE WATER/SEDIMENT SAMPLE LOCATION (2004 SA2 RI)
- STORMWATER SAMPLE LOCATION (2004 SA2 RI)
- SEEP SAMPLING LOCATION (2004 SA2 RI)
- POND SAMPLING LOCATION (2004 SA2 RI)
- SURFACE WATER/SEDIMENT LOCATION (2000 MENZIE CURRA/SITE R GMCS)
- CONE PENETROMETER TESTING (CPT) LOCATION (2005 SA2 SUPPLEMENTAL INVESTIGATION)
- SHALLOW AQUIFER MONITORING WELL LOCATION (2005 SA2 SUPPLEMENTAL INVESTIGATION)
- GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2005 SA2 SUPPLEMENTAL INVESTIGATION)
- SOIL SAMPLING LOCATION (2005 SA2 SUPPLEMENTAL INVESTIGATION)
- ANOMALY TRENCH LOCATION (2005 SA2 SUPPLEMENTAL INVESTIGATION)
- TEST TRENCH LOCATION (2005 SA2 SUPPLEMENTAL INVESTIGATION)
- MONITORING WELL CLUSTER (2006 SA2 SUPPLEMENTAL INVESTIGATION)
- NAPL INVESTIGATION MONITORING WELL (2006 SA2 SUPPLEMENTAL INVESTIGATION)
- WGK PLUME STABILITY MONITORING WELL (2006)
- GROUNDWATER/UPGRADIENT GROUNDWATER PROFILING LOCATION (2006 SA2 SUPPLEMENTAL INVESTIGATION)
- REGIONAL GROUNDWATER MONITORING WELL

PENGAD-Bayonne, N. J.
EXHIBIT
2

R5AN R5AU R5AM R5AD R5BN R5BU R5BM R5BD R5CM
R6AU R6AM R6BU R6AD R6BM R6BD R6CM

SAUGET AREA 2 SAUGET, ILLINOIS		PROJECT NO. 21561683.80011
URS		
DRN. BY: djd 10/13/06 DSGN. BY: bmh CHKD. BY:	Site Map	FIG. NO. 1

Exhibit 3
Comparison of CLAY -2 and MW-4
Results above Class I GW standards in at least one sample.

Constituent	Ill. Class I GW Standard	Clay – 2 22 ft deep (SH)	MW-4 SHU	Clay – 2 62/82 ft deep (MHU)	MW-4 MHU	Clay - 2 102/119 ft Deep (DHU)	MW-4 (DHU)
1,1,1 trichloroethane	200	23,000	Nd	320/450	Nd	Nd/9800	Nd
1,1,2 – trichloroethane	5	670	Nd	Nd/23	Nd	Nd/53	Nd
1,1- dichloroethane	700	12,000	Nd	230/350	110	55/2100	Nd
1,1 – dichloroethylene	7	2,100	Nd	Nd/230	110	Nd/460	Nd
1,2 dichloroethene (total)	170	40,000	Nd	700/1,500	614	140/9600	13
Benzene	5	63,000	4,400	600/810	55	230/5900	26
Chlorobenzene	100	4,800	11,000	280/520	290	4,800/1300	3,100
Chloroform	.2	610	Nd	Nd/60	Nd	Nd/96	Nd
Ethylbenzene	700	1,600	69	Nd/45	Nd	Nd/400	Nd
Toluene	1,000	34,000	Nd	770/1000	1.9	300/11000	Nd
Trichloroethene	5	690	Nd	Nd/nd	Nd	Nd/nd	nd
Vinyl chloride	2	510	Nd	Nd/51	69	Nd/96	Nd
1,2,4 – trichlorobenzene	70	100	Nd	1.8/.97	Nd	Nd/3	nd
1,2 – dichlorobenzene	600	1,900	10	23/5.5	11	27/62	14
1,4 - dichlorobenzene	75	1,600	53	34/13	32	630/170	730
2,4 – dichlorophenol	21	190	Nd	Nd/nd	Nd	Nd/9.1	15
Naphthalene	140	160	53	Nd/nd	1.9	Nd/8.5	Nd
Phenol	100	290	80	24/nd	2.9	Nd/77	2.8
Pentachlorophenol	1	11	Nd	Nd/nd	Nd	Nd/.25	Nd
Arsenic	50	210	97	28/37	Nd	10/130	nd
Lead	7.5	25	5	45/51	Nd	7.1/110	Nd
Indeno (1,2,3-cd) pyrene	.43	Nd	Nd	Nd/.59	Nd	Nd/nd	Nd
2- chlorophenol	35	8.2	55	Nd/4.4	3.5	43/4.3	47

*Yellow highlights are results above the Illinois Class I Groundwater Standards.

REPORT NUMBER: 39239 5169

AMERICAN BOTTOMS REGIONAL
WASTEWATER TREATMENT PLANT
1 American Bottoms Road
Sauget, Illinois 62201
(618) 337-1710

SAMPLE NAME: Site R

SAMPLE DATE: 5/24/07

SAMPLE ID: AD47010

METHOD: EPA-624

ANALYSIS DATE 5/30/07

PARAMETER	ANALYST	RESULT	MDL	UNITS
1,1,1-Trichloroethane	MDK	BDL	1	ug/L
1,1,2,2-Tetrachloroethane	MDK	BDL	1	ug/L
1,1,2-Trichloroethane	MDK	BDL	1	ug/L
1,1-Dichloroethane	MDK	17	1	ug/L
1,1-Dichloroethene	MDK	3	1	ug/L
1,2-Dichlorobenzene	MDK	500	30	ug/L
1,2-Dichloroethane	MDK	203	9	ug/L
1,2-Dichloroethene (cis)	MDK	41	1	ug/L
1,2-Dichloroethene (trans)	MDK	BDL	3	ug/L
1,2-Dichloropropane	MDK	BDL	1	ug/L
1,3-Dichlorobenzene	MDK	36	3	ug/L
1,3-Dichloropropene (cis)	MDK	BDL	0.9	ug/L
1,3-Dichloropropene (total)	MDK	BDL	0.9	ug/L
1,3-Dichloropropene (trans)	MDK	BDL	1	ug/L
1,4-Dichlorobenzene	MDK	460	30	ug/L
2-Butanone	MDK	101	1	ug/L
4-Methyl-2-Pentanone	MDK	176	1	ug/L
Acetone	MDK	2400	100	ug/L
Acetonitrile	MDK	35	2	ug/L
Acrylonitrile	MDK	BDL	1	ug/L
Benzene	MDK	620	10	ug/L
Bromodichloromethane	MDK	BDL	0.8	ug/L
Bromoform	MDK	BDL	0.8	ug/L
Bromomethane	MDK	BDL	1	ug/L
Carbon Disulfide	MDK	BDL	1	ug/L
Carbon Tetrachloride	MDK	BDL	0.9	ug/L
Chlorobenzene	MDK	3460	80	ug/L
Chloroethane	MDK	8	2	ug/L
Chloroform	MDK	12.7	0.9	ug/L
Chloromethane	MDK	BDL	1	ug/L
Dibromochloromethane	MDK	BDL	0.8	ug/L
Ethyl benzene	MDK	109	0.9	ug/L
Methylene Chloride	MDK	15	1	ug/L
o-Xylene	MDK	80.3	0.9	ug/L
Tetrachloroethene	MDK	38.1	0.9	ug/L
Toluene	MDK	620	10	ug/L
Trichloroethene	MDK	34	1	ug/L
Vinyl Chloride	MDK	14	1	ug/L

MDL = Method Detection Limit BDL = Below Detection Limit 6/6/07 12:24:24 PM

EXHIBIT 4

PENGAD-Bayonne, N. J.

REPORT NUMBER: 39240 3722

AMERICAN BOTTOMS REGIONAL
WASTEWATER TREATMENT PLANT
1 American Bottoms Road
Sauget, Illinois 62201
(618) 337-1710

SAMPLE NAME: Site R

SAMPLE DATE: 5/25/07

SAMPLE ID: AD47044

METHOD: EPA-624

ANALYSIS DATE 6/1/07

PARAMETER	ANALYST	RESULT	MDL	UNITS
1,1,1-Trichloroethane	MDK	BDL	1	ug/L
1,1,2,2-Tetrachloroethane	MDK	BDL	1	ug/L
1,1,2-Trichloroethane	MDK	BDL	1	ug/L
1,1-Dichloroethane	MDK	19	1	ug/L
1,1-Dichloroethene	MDK	4	1	ug/L
1,2-Dichlorobenzene	MDK	410	30	ug/L
1,2-Dichloroethane	MDK	234	9	ug/L
1,2-Dichloroethene (cis)	MDK	56	1	ug/L
1,2-Dichloroethene (trans)	MDK	3	3	ug/L
1,2-Dichloropropane	MDK	BDL	1	ug/L
1,3-Dichlorobenzene	MDK	38	3	ug/L
1,3-Dichloropropene (cis)	MDK	BDL	0.9	ug/L
1,3-Dichloropropene (total)	MDK	BDL	0.9	ug/L
1,3-Dichloropropene (trans)	MDK	BDL	1	ug/L
1,4-Dichlorobenzene	MDK	420	30	ug/L
2-Butanone	MDK	124	1	ug/L
4-Methyl-2-Pentanone	MDK	194	1	ug/L
Acetone	MDK	3700	100	ug/L
Acetonitrile	MDK	42	2	ug/L
Acrylonitrile	MDK	BDL	1	ug/L
Benzene	MDK	700	10	ug/L
Bromodichloromethane	MDK	BDL	0.8	ug/L
Bromoform	MDK	BDL	0.8	ug/L
Bromomethane	MDK	BDL	1	ug/L
Carbon Disulfide	MDK	BDL	1	ug/L
Carbon Tetrachloride	MDK	BDL	0.9	ug/L
Chlorobenzene	MDK	4040	80	ug/L
Chloroethane	MDK	17	2	ug/L
Chloroform	MDK	16.2	0.9	ug/L
Chloromethane	MDK	BDL	1	ug/L
Dibromochloromethane	MDK	BDL	0.8	ug/L
Ethyl benzene	MDK	133	0.9	ug/L
Methylene Chloride	MDK	17	1	ug/L
o-Xylene	MDK	90.6	0.9	ug/L
Tetrachloroethene	MDK	47.3	0.9	ug/L
Toluene	MDK	740	10	ug/L
Trichloroethene	MDK	44	1	ug/L
Vinyl Chloride	MDK	21	1	ug/L

MDL = Method Detection Limit BDL = Below Detection Limit 6/7/07 8:55:54 AM

REPORT NUMBER: 39211 5940

AMERICAN BOTTOMS REGIONAL
WASTEWATER TREATMENT PLANT
1 American Bottoms Road
Sauget, Illinois 62201
(618) 337-1710

SAMPLE NAME: Site R
SAMPLE DATE: 4/2/07
SAMPLE ID: AD44930
METHOD: EPA-625
ANALYSIS DATE 4/6/07

PARAMETER	ANALYST	RESULT	MDL	UNITS
2,4,5-Trichlorophenol	MDK	BDL	0.6	ug/L
2,4,6-Trichlorophenol	MDK	100	8	ug/L
2,4-Dichlorophenol	MDK	197	8	ug/L
2,4-Dimethylphenol	MDK	BDL	1	ug/L
2,4-Dinitrophenol	MDK	BDL	0.5	ug/L
2-Chlorophenol	MDK	350	10	ug/L
2-Nitrophenol	MDK	BDL	1	ug/L
4,6-Dinitro-2-methylphenol	MDK	BDL	0.6	ug/L
4-Chloro-3-methylphenol	MDK	BDL	0.5	ug/L
4-Nitrophenol	MDK	BDL	1	ug/L
o-cresol	MDK	BDL	1	ug/L
p-Cresol & m-Cresol	MDK	47	1	ug/L
Pentachlorophenol	MDK	5.2	0.9	ug/L
Phenol	MDK	950	10	ug/L
1,2,4-Trichlorobenzene	MDK	48	1	ug/L
1,2-Dichlorobenzene	MDK	258	9	ug/L
1,2-diphenylhydrazine	MDK	BDL	1	ug/L
1,3-Dichlorobenzene	MDK	BDL	0.8	ug/L
1,4-Dichlorobenzene	MDK	145	9	ug/L
1-Chloro-2-nitrobenzene	MDK	917	8	ug/L
1-Chloro-3-nitrobenzene	MDK	144	9	ug/L
1-Chloro-4-nitrobenzene	MDK	142	9	ug/L
2,4-Dinitrotoluene	MDK	BDL	2	ug/L
2,6-Dinitrotoluene	MDK	BDL	2	ug/L
2-Chloroaniline	MDK	17400	200	ug/L
2-Chloronapthalene	MDK	9	1	ug/L
2-Nitroaniline	MDK	BDL	0.7	ug/L
3,3-Dichlorobenzidine	MDK	BDL	2	ug/L
3-Chloroaniline	MDK	1810	50	ug/L
4-Bromophenyl-phenyl ether	MDK	BDL	1	ug/L
4-Chloroaniline	MDK	4920	50	ug/L
4-Chlorophenol-phenyl ether	MDK	BDL	1	ug/L
4-Nitroaniline	MDK	BDL	1	ug/L
Acenaphthene	MDK	BDL	0.9	ug/L
Acenaphthylene	MDK	BDL	1	ug/L
Aniline	MDK	4800	50	ug/L
Anthracene	MDK	BDL	0.6	ug/L
Benzo(a)anthracene	MDK	BDL	1	ug/L
Benzo(a)pyrene	MDK	BDL	0.5	ug/L

MDL = Method Detection Limit BDL = Below Detection Limit 5/9/07 2:15:25 PM

REPORT NUMBER: 39211 5940

AMERICAN BOTTOMS REGIONAL
WASTEWATER TREATMENT PLANT
1 American Bottoms Road
Sauget, Illinois 62201
(618) 337-1710

SAMPLE NAME: Site R
SAMPLE DATE: 4/2/07
SAMPLE ID: AD44930
METHOD: EPA-625
ANALYSIS DATE 4/5/07

PARAMETER	ANALYST	RESULT	MDL	UNITS
Benzo(b)fluoranthene	MDK	BDL	0.6	ug/L
Benzo(g,h,i)perylene	MDK	BDL	1	ug/L
Benzo(k)fluoranthene	MDK	BDL	0.6	ug/L
bis(2-Chloroethoxy)methane	MDK	BDL	0.8	ug/L
bis(2-Chloroethyl)ether	MDK	BDL	1	ug/L
bis(2-Chloroisopropyl)ether	MDK	BDL	0.7	ug/L
bis(2-Ethylhexyl)phthalate	MDK	BDL	3	ug/L
Butylbenzylphthalate	MDK	BDL	4	ug/L
Carbazole	MDK	BDL	1	ug/L
Chrysene	MDK	BDL	0.6	ug/L
Dibenzo(a,h)anthracene	MDK	BDL	0.5	ug/L
Diethylphthalate	MDK	BDL	1	ug/L
Dimethylphthalate	MDK	BDL	0.7	ug/L
Di-n-butylphthalate	MDK	BDL	3	ug/L
Fluoranthene	MDK	BDL	0.6	ug/L
Fluorene	MDK	BDL	1	ug/L
Hexachlorobenzene	MDK	BDL	0.6	ug/L
Hexachlorobutadiene	MDK	BDL	2	ug/L
Hexachlorocyclopentadiene	MDK	BDL	2	ug/L
Hexachloroethane	MDK	BDL	0.9	ug/L
Indeno(1,2,3-cd)pyrene	MDK	BDL	1	ug/L
Isophorone	MDK	BDL	0.8	ug/L
Naphthalene	MDK	BDL	1	ug/L
n-Decane	MDK	BDL	0.5	ug/L
Nitrobenzene	MDK	BDL	0.8	ug/L
N-Nitrosodimethylamine	MDK	BDL	0.7	ug/L
N-Nitroso-di-n-propylamine	MDK	BDL	0.7	ug/L
N-Nitrosodiphenylamine	MDK	BDL	2	ug/L
n-Octadecane	MDK	BDL	0.7	ug/L
Phenanthrene	MDK	BDL	0.5	ug/L
Pyrene	MDK	BDL	0.7	ug/L

MDL = Method Detection Limit BDL = Below Detection Limit 5/9/07 2:15:25 PM